



**Warwick District Council  
Publication Draft Local Plan**

**Sustainability Appraisal Report**

**April 2014**

*enfusion*



# Warwick District Council Publication Draft Local Plan

## Sustainability Appraisal Report

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## **SA OF WARWICK DISTRICT COUNCIL'S PUBLICATION DRAFT LOCAL PLAN - SUSTAINABILITY APPRAISAL REPORT**

### **NON-TECHNICAL SUMMARY**

#### **INTRODUCTION**

1. This is the summary of the Sustainability Appraisal Report for Warwick District Council's Publication Draft Local Plan. It describes how the Sustainability Appraisal (SA) process was used to assist in planning for the development and the use of land, as required by planning legislation and National Planning Guidance. The SA assists sustainable development through providing the opportunity to consider reasonable alternatives in which the plan can contribute to improving environmental, social and economic conditions as well as providing the opportunity to identify and mitigate any potential adverse effects that the plan might otherwise have had.

#### **WARWICK DISTRICT COUNCIL'S DRAFT LOCAL PLAN**

2. The Local Plan will guide future development in the District for the next 15 years. It sets out how much new development (land for housing and employment) is needed and where this development should take place as well as provides information about the infrastructure (roads, schools, open spaces, etc) needed to support new development.
3. The Local Plan includes a Vision for the District as follows:  
  
The Council's Vision for Warwick District (which we share with our partners), as set out in the Sustainable Community Strategy, is "to make Warwick District a Great Place to Live, Work and Visit".
4. The Council and its partners are trying to deliver this vision together through the Sustainable Community Strategy. The Local Plan aligns with the Warwick District Sustainable Community Strategy by focusing on the following strategic priorities:
  - Supporting Prosperity: seeking to enable the District's economy to prosper by providing opportunities for businesses to grow and relocate is an important priority for the Local Plan. To achieve this, the Plan sets out policies and proposals to support employment, vibrant town centres and a strong cultural and tourism offer.
  - Providing the homes the District needs: providing opportunities to deliver the housing needed to support the District's changing and growing population is central to the Plan, ensuring this is high quality and affordable, at the same time as meeting the needs of everyone including those with specialist housing needs.
  - Supporting sustainable communities (including health and wellbeing and community safety): there are many aspects to the delivery of sustainable communities including the design and layout of new development;

provision of infrastructure; spaces and services to enable healthy and safe lifestyles; regeneration and enhancement of existing communities and environments and the protection of the natural and built environment.

5. In the Local Plan, these strategic priorities, are supported by a Spatial Strategy which seeks to:
  - maximise use of brownfield sites;
  - only bring forward greenfield sites in sustainable locations;
  - avoid coalescence between settlements;
  - protect important heritage assets;
  - protect areas of high landscape value and important natural assets;
  - focus employment, retail, leisure and cultural activities in town centres; and
  - only develop sites in the Green Belt where exceptional circumstances can be justified.
6. The Local Plan's objectives link the Local Plan strategy, with the specific proposals set out within the Local Plan Chapters. The objectives provide the framework to deliver sustainable development by balancing social, economic and environmental imperatives and where possible enhancing all three. The Objectives are as follows:
  - Objective 1: Providing sustainable levels of growth in the District.
  - Objective 2: Providing well-designed new developments that are in the right location and address climate change
  - Objective 3: Enabling the District's infrastructure to improve and support growth
7. The Publication Draft Local Plan contains 20 development strategy policies that set out the level and location of growth, 15 housing policies, 31 policies for delivering prosperous communities, 45 policies for sustainable communities and 2 infrastructure policies.

## **SUSTAINABILITY APPRAISAL & STRATEGIC ENVIRONMENTAL ASSESSMENT**

8. Planning legislation requires that a Local Plan is subject to a SA, a systematic process that is designed to evaluate the predicted social, economic and environmental effects of development planning. European and UK legislation require that the Local Plan is also subject to a Strategic Environmental Assessment (SEA), a process that considers the effects of development planning on the environment. Government Policy and Guidance advises that these two processes should be carried out together and outlines a number of stages of SA work that need to be carried out as the Local Plan is being prepared:
  - Stage A: Setting Context and Objectives, establishing the Baseline and Deciding the Scope
  - Stage B: Developing and Refining Alternatives and Assessing Effects

- Stage C: Preparing the SA Report
  - Stage D: Publish and Consult on the SA Report and the Local Plan
  - Stage E: Post Adoption Report and Monitoring
9. The SA of Warwick District Council's Draft Local Plan has been prepared in accordance with the requirements for both SA and SEA.

#### **SUSTAINABILITY CHARACTERISTICS OF THE LOCAL PLAN AREA AND LIKELY EVOLUTION WITHOUT THE PLAN**

10. Baseline information about the Local Plan area has been collected and updated since the onset of the plan-making and SA processes. Relevant and sufficient information on the present and future state of the area has been collected in order to adequately predict the potential effects of implementing the Local Plan on the area. Baseline analysis provides the basis for making judgments about how the emerging content of the Local Plan might hinder or progress objectives for sustainable development.
11. Warwick District covers an area of some 283 km<sup>2</sup>. The District lies within the heart of Warwickshire to the south of the city of Coventry and is surrounded on all sides except for the South East by Green Belt. The District comprises four main towns including Royal Leamington Spa, Warwick, Kenilworth and Whitnash with approximately 90% of the district's population live in these urban areas with the remaining 10% living in a number of relatively small villages. These main centres contain a wide range of different types of housing although there are affordability issues.
12. The total estimated population in 2011 was 137,700. The population has grown from 124,000 in 2000 - an 11% increase - and is forecast to continue to grow, with potentially a 17% growth over the next 15 years. Compared to other parts of Warwickshire, a higher proportion of the District's population is of working age. The highest rate of projected population growth in the future is expected to be amongst those aged 65 and over.
13. The District has a diverse population, with a high proportion of non-white British residents (15% of the total population) compared to other Districts in the County. Relative to the West Midlands as a whole, the District has a strong local economy, with a skilled population and higher than average levels of productivity and earnings compared with regional and national averages. There are good road and rail links with surrounding major urban areas.
14. The District's relative prosperity masks some significant areas of deprivation. In particular, Lillington lies within the most deprived 20% of Super Output Areas nationally. Further, the changing needs of business means that some of the District's traditional industrial areas require regeneration, with many of these areas located alongside the Grand Union Canal in Warwick and Royal Leamington Spa. The District's 40km of canal offer particular opportunities for recreation, regeneration and environmental improvement.
15. The three main town centres of Royal Leamington Spa, Kenilworth and Warwick provide a focus for retail, leisure and employment. The unique and



high quality environments of these town centres has meant that they have been relatively resilient to the recent recession and the competition from online retailing and other retail areas and town centres. Despite this there has been an increase in vacancy rates and a fall in rents in some of parts of the town centres indicating a need to continue to focus investment in these areas.

16. The District also contains a large number of environmental assets of mainly national or local importance including features of historic interest, geological/geomorphological significance and particular habitats of nature conservation interest. Areas of historic or environmental importance in the District include:
  - 7 Sites of Special Scientific Interest
  - 15 Sites of Importance for Nature Conservation
  - 2,145 Listed Buildings
  - 29 Conservation Areas (covering 4% of the District)
  - 11 Registered Parks and Gardens (covering 4% of the District)
17. Air quality and traffic congestion, particularly in the main towns, are key issues. However, the District produces the lowest amount of waste per head compared to the other local authorities in Warwickshire. In addition, in terms of measuring well-being, Warwick District emerged as having a smaller number of areas where people are estimated to have low well-being in Warwickshire as a whole and the health of residents is generally better than in other areas of the County. The District also has the lowest overall recorded crime rates in Warwickshire.
18. Without the Local Plan existing trends are likely to continue and there would be a lack of co-ordination between where new development takes place and where it is needed. Development would not necessarily be directed towards the areas with the least constraints, which could have adverse effects on sensitive receptors such as the natural environment and heritage.

## **KEY SUSTAINABILITY ISSUES, PROBLEMS AND OPPORTUNITIES**

19. Plans and programmes that could affect the Local Plan were reviewed and considered together with information collected relevant to the characteristics of the District. From these studies the key sustainability issues and opportunities for the Local Plan were identified as follows:
  1. The effects of the recent recession and not knowing how the local economy will change in the future.
  2. Relatively high house prices limiting local people's ability to buy or rent property in the area, creating the need for more affordable housing for families in towns and villages. Another issue is the need to provide more housing to meet people's needs in the future, particularly those of older people.
  3. The economic strength of the town centres of Warwick, Leamington Spa and Kenilworth, and the threat to these from retail and leisure developments elsewhere.

4. The size and condition of existing community facilities and services (particularly schools and health-care facilities) and whether they can meet current and future needs.
  5. People's general health and well-being, and the need for people (particularly teenagers and young people) to have access to sport and cultural experiences, such as cinemas and community events.
  6. Road congestion and air pollution, particularly around the main junctions along the A46 and M40, the routes into the towns, and within the town centres.
  7. The threat of flooding of homes and businesses in some areas, particularly where surface water may flood towns and villages, and the concern that the threat of flooding will increase because of climate change.
  8. Areas of poverty in Warwick and Leamington Spa.
  9. The pressure for new development threatening the high-quality built and natural environments in the district, particularly historic areas, and the cost of maintaining historic buildings and areas.
  10. Crime and the fear of crime, particularly in town centres, and the need to protect the community from harm.
  11. The Government's planned High Speed 2 rail line and its possible effects on the area. (The Government is consulting the public separately on this issue.)
20. The baseline and review of other plans was updated in 2013 and 2014 so that the basis for assessment remained current. This also demonstrated that the sustainability issues are still relevant and that the methods of assessment remain applicable.

#### **HOW HAS THE LOCAL PLAN BEEN ASSESSED?**

21. An SA Framework was compiled and included SA Objectives that aim to resolve the issues and problems identified for development planning in the Local Plan area. This SA Framework, together with the baseline information, comprised the basis for assessment, and is summarised in the following table:

<b>Objective</b>	<b>Key Questions</b>
1. To have a strong and stable economy	Will it help meet the employment needs of the local community? Will it help diversify the economy in general? Will it enhance the vitality and viability of the town centre? Will it encourage or enable inward investment? Will it promote investment in future prosperity (for example by supporting R&D, small businesses and/or encouraging skills development)?
2. To enable a range of sustainable transport options	Will it encourage the use of public transport, walking or cycling? Will it help reduce traffic congestion?
3. To reduce the need to travel	Will it reduce the overall need to travel? Will it help reduce the need to travel by car / lorry?

Objective	Key Questions
4. To reduce the generation of waste and increase recycling	Will it encourage the management of waste in line with the waste management hierarchy, giving first priority to reducing waste, followed by reuse and recycling, then other forms of energy recovery and lastly disposal? . Will any residual disposal be undertaken in the least environmentally detrimental manner?
5. To ensure the prudent use of land and natural resources	Does it optimise the use of previously developed land and buildings? Will it minimise development on Greenfield land? Will it reduce the amount of derelict, degraded or underused land? Does it make efficient use of existing physical infrastructure (i.e. instead of requiring new infrastructure to be built)? Does it encourage resource-efficient design and/or construction (in terms of water and/or raw materials)? Does it encourage the use of materials from alternative and renewable sources?
6. To protect and enhance the natural environment	Will it protect and enhance species, habitats and sites designated for their nature conservation interest? Will it safeguard and/or enhance the character of significant landscape areas?
7. To create and maintain safe, well-designed, high quality built environments	Will it help provide a sense of identity and local distinctiveness? Will it protect or enhance the setting of the town? Will it promote design that enhances townscapes? Will it protect or improve safety in built environments?
8. To protect and enhance the historic environment	Will it protect and enhance sites, features and areas of historical, archaeological and cultural value? Will it encourage appropriate use of and/or access to buildings and landscapes of historical/cultural value?
9. To create good quality air, water and soils	Will it affect local air quality? Will it affect air quality in the Air Quality Management Areas? Will it minimise pollution of soils? Will it minimise light and noise pollution levels? Will it retain the best quality agricultural land? Will it minimise adverse effects on ground and surface water quality?
10. To minimise the causes of climate change by reducing greenhouse gases and increasing the proportion of energy generated from renewable and low carbon sources.	Will it reduce overall energy use through increased energy efficiency? Will it reduce or minimise greenhouse gas emissions? Will it increase the proportion of energy generated from renewable and low carbon sources?
11. To adapt to the predicted impacts of climate change including flood risk	Will it reduce or minimise the risk of flooding? Will it minimise sensitive development in medium and high risk flood zones?

Objective	Key Questions
12. To meet the housing needs of the whole community (ensuring the provision of decent and affordable housing for all, of the right quantity, type, size and tenure)	Is it enabling the housing target to be met? Does it provide for the development of balanced communities by encouraging an appropriate mix of housing (in terms of type, size and tenure)? Will it reduce homelessness and housing need? Will it reduce the number of empty homes?
13. To protect, enhance and improve accessibility to local services and community facilities	Will it maintain and enhance existing community facilities? Will it put unacceptable pressure on existing services and community facilities? Will it improve access to local services and facilities for the whole community?
14. To improve health and well being	Will it promote healthy lifestyles? Will it provide and improve access to health and social care services? Will it provide and/or enhance the provision of open space? Will it improve opportunities to participate in the district's cultural, sport and recreational opportunities?
15. To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?
16. To reduce crime, fear of crime and antisocial behaviour	Will it reduce actual levels of crime? Will it reduce the fear of crime? Will it reduce / discourage anti-social behaviour?

22. Each emerging part of the Local Plan, including options for distributing housing, employment and infrastructure, potential allocations, and policies to control proposed development, was subject to SA. Using the SA Framework, the baseline information and professional opinion, the likely effects of the emerging Local Plan were assessed. The SA considered positive, negative and cumulative effects for alternatives according to categories of significance as set out in the following table:

Categories of Significance		
Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
=	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive

23. Sustainability Appraisal is informed by the best available information and data. However data gaps and uncertainties exist and it is not always possible to accurately predict effects at a strategic plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional/national level, and therefore a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

#### **WHAT REASONABLE ALTERNATIVES HAVE BEEN CONSIDERED AND ASSESSED?**

24. Throughout the development of the Local Plan, alternatives have been considered and appraised through the SA process in an iterative and ongoing way such that the findings of the SA have informed plan-making. Alternatives for the level and distribution of growth as well as potential site allocations have been considered from the early stages - from the SA Scoping Report (March 2011) through to the production of this SA Report (April 2014). The findings of the SA of alternatives and the reasons for the selection or rejection of options are provided in the main SA Report.

#### **WHAT ARE THE LIKELY SIGNIFICANT EFFECTS OF THE PUBLICATION DRAFT LOCAL PLAN?**

25. **Housing** (SA Objectives 7 & 12) Overall, the Local Plan is considered to have the potential for major short to long-term positive cumulative effects on housing through the provision of 12,860 new homes to meet the objectively assessed need of the District during the life of the Plan. Housing will be distributed across the District in urban and rural areas and Local Plan policies will ensure that a suitable mix of homes are provided to meet the needs of all people in the future. The increased supply of housing as a result of the policies and allocations could also have the effect of reducing house prices in the area, which was identified as a key sustainability at the scoping stage. The Local Plan also seeks to provide affordable housing that will also help to address this issue. Local Plan policies seek to protect the existing built environment and also require any new development to be well designed and be high quality.
26. **Economy and Employment** (SA Objective 1) Overall, the Local Plan is considered to have the potential for major short to long-term positive cumulative effects on the economy and employment through the provision of 66 ha of employment land during the life of the Plan. Major allocations for employment have been distributed between Leamington, Kenilworth and the sub-regional employment area in the north of the District. The Local Plan protects existing employment as well as supports economic growth through both the regeneration of previously developed land as well as development of suitable Greenfield sites. It also seeks to maintain the shopping function of the town centres and support proposals that enhance their roles.

27. **Communities and Health** (SA Objectives 13, 14, 15 & 16) The Local Plan seeks to protect and enhance accessibility to community facilities and services, which includes open space for recreation and health facilities. Provision is made for new community facilities and improvements to sustainable transport modes will help to improve accessibility. Policies support development that is of the highest quality and ensures that new development is integrated with existing communities and that the design and layout of proposals minimise the potential for crime and anti-social behaviour. The provision of housing and employment will help to meet the future needs of communities in the District and the amenity of residents is also protected. It is therefore considered that the Local Plan as a whole will have major positive cumulative effects in the long-term for communities and health.
28. **Transport and Accessibility** (SA Objective 2 & 3) Local Plan policies seek to address the impacts of proposed development on the road network and ensure that appropriate infrastructure is provided. The IDP sets out a range of highways and sustainable transport infrastructure that will need to be delivered during the life of the Plan to support proposed development. Local Plan policies also seek to improve public transport and pedestrian routes and encourage the use of sustainable transport modes. These measures along with the delivery of housing, employment and community facilities/ services has the potential for a long-term positive cumulative effect on transport and accessibility.
29. **Air Quality** (SA Objective 9) It is considered that major negative effects on air quality are unlikely as a result of the Local Plan. Policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes as well as encourage the use of sustainable transport modes. While there may be some localised impacts in the short-term as a result of proposed development, the mitigation proposed through Local Plan policies and predicted trends in air quality will ensure that these are not significant.
30. **Climate Change and Flooding** (SA Objective 10 & 11) Local Plan policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes and encourage the use of sustainable transport modes. These measures along with predicted trends in air quality should ensure that the Local Plan does not have major long-term negative effects on climate change as a result of increased traffic. There is also the potential for the Local Plan to have negative cumulative effects through the embodied energy inherent in the construction and maintenance of development. Processing methods and technologies are likely to improve reducing the amount of embodied energy used; however this is uncertain.
31. **Water Resources and Water Quality** (SA Objectives 5 & 9) Overall, the Local Plan is considered to have the potential for minor negative cumulative effects on this topic through the provision of 12,860 homes and 66 ha of employment land during the life of the Plan. Local Plan policies protect the water environment and encourage the inclusion of water efficiency measures and sustainable drainage systems as well as the provision of necessary infrastructure. Mitigation measures should ensure that negative cumulative effects are not significant.

32. **Natural Environment (Landscape, Flora and Fauna and Soils)** (SA Objective 5, 6 & 9) The level of growth proposed through the Local Plan has the potential for major long-term negative effects on the natural environment. To address this, the Local Plan seeks to direct development away from sensitive areas and also protect, enhance and restore the natural environment. The mitigation provided by Plan policies and available at the project level should address negative effects to ensure they are not significant for the landscape or biodiversity; however, the overall cumulative effect of the Local Plan remains uncertain. The Local Plan will lead to the loss of large areas of best and most versatile agricultural land.
33. **Cultural Heritage** (SA Objective 8) Overall the Local Plan seeks to protect and enhance heritage as well as avoid development that would have an impact on the significance of heritage assets. It seeks to direct development to the available and suitable areas with the least constraint. Whilst it is recognised that development has the potential for negative effects on heritage it is also considered that there is the opportunity for positive effects by enhancing assets and promoting improved access. There is suitable mitigation available to address negative effects to ensure that they are not significant; however, the overall cumulative effect of the Local Plan on heritage remains uncertain.
34. **Waste and Recycling** (SA Objective 4) Overall, the Local Plan is considered to have the potential for minor negative cumulative effects on this topic through the provision of 12,860 homes and 66 ha of employment land during the life of the Plan. Local Plan policies expect development proposals to make sufficient provision for sustainable waste management and they also allow for sufficient flexibility to address increased future demand for waste facilities as a result of proposed development.

#### **HOW COULD NEGATIVE EFFECTS BE MITIGATED AND POSITIVE EFFECTS ENHANCED?**

35. An important role of the SA process is to provide recommendations for the mitigation of negative effects and enhancement of the positive effects identified in the appraisal process. These can then be carried forward in the remainder of the plan-making process and can include further recommendations for other development plan documents and for processes including site master planning.
36. In preparing Local Plan policies, Warwick District Council has sought to mitigate the negative effects of development and maximise the opportunities presented. The proposed Policies and Site Allocations presented in the Publication Draft Local Plan reflect recommendations arising from all the previous SA work undertaken to support the plan development stages, and the Council is commended for their effective and thorough integration of key sustainability themes and requirements throughout the progression of the Plan. In particular, the findings of the SA guided the selection of potential site allocations by identifying sustainability issues and in particular the cumulative effects of development for settlements and sensitive receptors.

37. Potential negative effects are mitigated through strong policies that seek to protect, enhance and restore the natural environment and heritage as well as promote strong sustainable communities through high quality layout and design. The Local Plan ensures that necessary infrastructure and investment is provided at the right times and in the right places to support new development and communities. It also seeks to create a healthy integrated network of Green Infrastructure by planning for the natural environment at a variety of spatial scales, which will have benefits for communities and nature as well as the economy.

## **CONSULTATION**

38. The emerging Local Plan and its accompanying SA documents have been subject to statutory consultation at the scoping stage with the statutory bodies (English Heritage, Environment Agency, and Natural England) and wider consultation with stakeholders and the public. The SA accompanying each stage of plan-making since 2011 has been subject to public consultation through provision of the documents on the Councils' Local Plan website. Comments made and responses to these comments have been recorded and also made available. Thus consultation has been a vital ongoing and iterative element of the plan-making and the SA processes. The Publication Draft Local Plan and the SA Report reflect the findings of various technical studies and the responses received during consultation.

## **MONITORING PROPOSALS**

39. Local Planning Authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. Monitoring proposals were suggested in the early SA scoping stage and will be progressed, including consultation, as the Local Plan progresses. The Council will prepare a monitoring strategy that will include consideration of any specific requirements from the SA process.

## **SUMMARY AND NEXT STEPS**

40. The Sustainability Appraisal of the Publication Draft Local Plan has appraised the effects of the policies and site allocations as well as the overall effects of the plan, including cumulative effects. The Appraisal has identified that the proposed Local Plan will help to address the identified sustainability issues in the area, with major positive effects particularly for communities through the allocation of a range of new housing and employment land, together with improvements to sustainable modes of transport. The key negative effects identified relate to the potential environmental impact of increased housing, employment and infrastructure development. Overall, the policies and proposed site allocations provide a strong positive framework to guide future sustainable development in the District.



41. The consultation responses received on the Publication Draft Local Plan and this Sustainability Appraisal Report will be used to finalise the Publication Draft Local Plan. Any significant changes to the policies or strategic allocations proposed in the Plan will be subject to further appraisal as necessary and a revised SA Report will be published alongside the Submission Document.
42. The SA Report is available for review and comments alongside the Publication Draft Local Plan for a 6 week period week commencing 12<sup>th</sup> May to 23<sup>rd</sup> June 2014. All responses should be sent to:

**Address:** Development Policy Manager  
Development Services  
Warwick District Council  
Riverside House  
Milverton Hill  
Leamington Spa  
CV32 5QH

**Email:** [newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk)

43. Responses may also be made using the Warwick District Council Website by using the following link:  
[www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)

## 1.0 Introduction

### Purpose of the SA and the SA Report

- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a local plan under section 19 (5) of the Planning and Compulsory Purchase Act 2004 ('the Act'). The SA process provides the opportunity to consider reasonable options or alternatives in which the plan can contribute to improving environmental, social and economic conditions as well as providing the opportunity to identify and mitigate any potential adverse effects that the plan might otherwise have had. It is used to assess the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives. As a result, it helps the local planning authority to meet the more general requirement under section 39 of the Act which is to prepare a local plan *"with the objective of contributing to the achievement of sustainable development."*
- 1.2 Government Policy advises that *"a Sustainability Appraisal which meets the requirements of the European Directive on strategic environmental assessment [(the SEA Directive)] should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors"* (Paragraph 165 National Planning Policy Framework, 2012). The SEA Directive has been transposed into English law through the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'SEA Regulations').
- 1.3 SA/ SEA is an ongoing and iterative process where the assessment occurs over the various stages of plan making. The National Planning Practice Guidance (2014) outlines the stages of SA work that need to be carried out as the Local Plan is being prepared:
- Stage A: Setting Context and Objectives, establishing the Baseline and Deciding the Scope
  - Stage B: Developing and Refining Alternatives and Assessing Effects
  - Stage C: Preparing the SA Report
  - Stage D: Publish and Consult on the SA Report and the Local Plan
  - Stage E: Post Adoption Report and Monitoring
- 1.4 This is the SA Report that documents the Sustainability Appraisal/Strategic Environmental Assessment processes for Warwick District Council's Local Plan. The Sustainability Appraisal Framework discussed in Section 3 of this SA Report explains further the relationship between the SA and the SEA; compliance with the SEA Directive and Regulations and the NPPF is detailed in Appendix I. This SA Report is being published for consultation with the Publication Draft Local Plan in accordance with SEA Regulations and SA Guidance.

## Background to the Local Plan and SA

- 1.5 Warwick District Council is preparing a Local Plan to guide future development in the Local Authority area. In accordance with the requirements of the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework 2012, the Council must carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of its Local Plan.
- 1.6 The SA/SEA of the Local Plan has been on-going since 2011 and is being undertaken alongside the preparation of the plan. The plan-making and SA/SEA processes to date are summarised in the table below:

**Table 1.1: Local Plan and SA/SEA documents**

<b>LDP Stage and Documents Consultation</b>	<b>SA/SEA Stage and Documents Consultation</b>
Issues and Scenarios Public consultation 17 March to 15 July 2011	SA Scoping Report Public consultation 17 March to 15 July 2011
Preferred Options Public consultation 01 June to 03 August 2012	Initial SA Report Public consultation 01 June to 03 August 2012
Revised Development Strategy Public consultation 14 June to 29 July 2013	Interim SA Report Public consultation 14 June to 29 July 2013
Publication Draft Local Plan Public Consultation w/c 12 <sup>th</sup> May to w/c 23 <sup>rd</sup> June 2014	SA Report (this report) Public Consultation w/c 12 <sup>th</sup> May to w/c 23 <sup>rd</sup> June 2014

## Local Plan: Content and Objectives

- 1.7 The Local Plan will guide future development in the District for the next 15 years. It sets out how much new development (land for housing and employment) is needed and where this development should take place as well as provides information about the infrastructure (roads, schools, open spaces, etc) needed to support new development.
- 1.8 The Council's vision for Warwick District (which we share with our partners), as set out in the Sustainable Community Strategy, is **"to make Warwick District a Great Place to Live, Work and Visit"**.
- 1.9 The Council and its partners are trying to deliver this vision together through the Sustainable Community Strategy. This sets out the approach to address 5 key priorities:
- Safer Communities
  - Health and Wellbeing
  - Housing
  - Prosperity
  - Sustainability

- 1.10 The Sustainable Community Strategy is central to improving the quality of life in the District across all these priorities. The Local Plan is a key element in the delivery of the Sustainable Community Strategy. The Local Plan has therefore been aligned with the Strategy to ensure it addresses the key priorities.
- 1.11 The Local Plan aligns with the Warwick District Sustainable Community Strategy by focusing on the following strategic priorities:
- Supporting Prosperity: seeking to enable the District's economy to prosper by providing opportunities for businesses to grow and relocate is an important priority for the Local Plan. To achieve this, the Plan sets out policies and proposals to support employment, vibrant town centres and a strong cultural and tourism offer.
  - Providing the homes the District needs: providing opportunities to deliver the housing needed to support the District's changing and growing population is central to the Plan, ensuring this is high quality and affordable, at the same time as meeting the needs of everyone including those with specialist housing needs.
  - Supporting sustainable communities (including health and wellbeing and community safety): there are many aspects to the delivery of sustainable communities including the design and layout of new development; provision of infrastructure; spaces and services to enable healthy and safe lifestyles; regeneration and enhancement of existing communities and environments and the protection of the natural and built environment.
- 1.12 In the Local Plan, these strategic priorities, are supported by a Spatial Strategy which seeks to:
- maximise use of brownfield sites;
  - only bring forward greenfield sites in sustainable locations;
  - avoid coalescence between settlements;
  - protect important heritage assets;
  - protect areas of high landscape value and important natural assets;
  - focus employment, retail, leisure and cultural activities in town centres; and
  - only develop sites in the Green Belt where exceptional circumstances can be justified.
- 1.13 The Local Plan's objectives link the Local Plan strategy, with the specific proposals set out within the Local Plan Chapters. The objectives provide the framework to deliver sustainable development by balancing social, economic and environmental imperatives and where possible enhancing all three. The Objectives are as follows:
- Objective 1:** Providing sustainable levels of growth in the District.
- 1.14 Provide a sustainable level of economic growth (and balance this with housing growth) to maintain high levels of employment, and to deal with pockets of unemployment in deprived areas. This Plan will:

- identify and maintain a flexible and varied supply of accommodation and land for business that is the right type and in the right location;
  - support the growth of advanced manufacturing and engineering businesses, knowledge industries, energy industries and the rural economy; and
  - improve the rates of business growth in the District to support the 'organic' growth of the local economy.
- 1.15 Provide a sustainable level of housing growth (and balance this with economic growth) to reduce the number of people who are currently homeless or living in unsatisfactory accommodation, to meet future housing needs, and to help deal with the issues of need for affordable housing. The Local Plan will:
- identify and maintain supply of land for housing to meet the objectively assessed needs for market and affordable housing ensuring this is of the right size, has the right tenure, and is in the right location;
  - make sure that the district can accommodate university students without harming the balance of existing communities;
  - allow providers to meet the special housing needs of the growing number of older people; and
  - make provision for gypsies and travellers in order to deal with local need and historic demand.
- 1.16 Provide a sustainable level of retail and leisure growth that will meet people's existing and future needs, and will maintain and improve the vitality and viability of existing town and local centres as attractive and safe places to visit both by day and night. The Local Plan will:
- plan for their future management and growth of each town centre, taking account of their unique roles, to provide sustainable levels of retail and leisure growth.

**Objective 2:** Providing well-designed new developments that are in the right location and address climate change

- 1.17 Make sure that new developments are in places that will reduce the need for people to use their cars. This will minimise air pollution and help address climate change by reducing road congestion and carbon emissions, and will encourage people to live more healthy lifestyles by walking and cycling more.
- 1.18 Encourage new developments to be designed and built so they use water and energy efficiently and reduce the overall demand for natural resources (specifically by increasing the use of renewable and low-carbon sources of energy to reduce carbon emissions).
- 1.19 Make sure that new developments are located, designed and built so that they can deal with the expected effects of climate change, particularly flooding.

- 1.20 Make sure new developments are appropriately distributed across the District and designed and located to maintain and improve the quality of the built and natural environments, particularly historic areas and buildings, sensitive wildlife habitats and areas of high landscape value. In addition new developments should respect the integrity of existing settlements.
- 1.21 Make sure new developments are built to a high standard in terms of design, and provide inclusive, lively and attractive places where people feel safe and want to live, work or visit.
- 1.22 Make sure new developments provide public and private open spaces where there is a choice of areas of shade, shelter and recreation which will benefit people and wildlife and provide flood storage and carbon management.
- 1.23 Protect and enhance high quality landscapes and important heritage and natural assets, ensuring that where adaptation is needed, this is done in a sensitive way.

**Objective 3:** Enabling the District's infrastructure to improve and support growth

- 1.24 Enable improvements to infrastructure, such as schools and the health services, to provide and maintain facilities and services people need, in locations people can get to and which support sustainable economic growth in deprived areas.
- 1.25 Enable energy, communications, water and waste organisations to improve their infrastructure and services so that they can meet people's current and future needs, protect the environment, and contribute towards dealing with the causes and mitigating the effects of climate change.
- 1.26 Enable transport providers to provide improvements, particularly better and more integrated public transport, cycling and pedestrian facilities, to meet people's current and future needs, improve the safety and efficiency of the transport network, and support sustainable economic growth.
- 1.27 Enable improvements to be made to the built and natural environments which will help to maintain and improve historic assets, improve habitats and their connectivity, help the public access and enjoy open spaces such as parks and allotments and support healthy lifestyles. Reduce the risk of flooding, keeping the effects of climate change (including the effects on habitats and wildlife) to a minimum,.
- 1.28 Enable the maintenance and improvement of the quality of sporting and leisure facilities, including opportunities for culture and tourism. This will include maintaining a flexible supply of land and buildings for sport and recreation that is the right quality and in the right location, and can meet people's current and future needs and support healthy lifestyles.

### **Structure of this Sustainability Report**

- 1.29 Section 2 explains the approach taken to SA and details the methods used for each stage and each element of the developing Local Plan. The scoping process and outcome is summarised in Section 2. Section 3 describes the characteristics of the Local Plan area, setting out the baseline conditions and the policy context, together with an indication of how the area might develop without the Local Plan. Details of baseline information and policy context are provided separately in Appendices II and III.
- 1.30 In consideration of the time that has progressed and the changes to the planning system, as well as recent case law on SEA that has guided current practice, Section 4 explains options in plan-making and alternatives assessment in SEA. Section 5 sets out the findings of the comprehensive SA of the emerging Publication Draft Local Plan.
- 1.31 The SEA Directive requires that the Report should include a description of the measures concerning monitoring and such proposals are set out in Section 6. A summary of the process and findings of the SA is provided in Section 7. In accordance with the SEA Directive, a Non Technical Summary is also provided - at the beginning of this SA Report and also available separately. Appendix I provides signposting to explain how this SA complies with the requirements of the SEA Directive and Regulations as well as the NPPF.

## 2.0 Appraisal Methods

### Scoping the Key Sustainability Issues and the SA Framework

- 2.1 During 2011 with the early stages of the Local Plan preparation, relevant plans and programmes (PP) were reviewed and baseline information was gathered and analysed by Officers to help identify the issues, problems and opportunities for the area (further detailed in the following Section 3). The details of this analysis were reported in the technical Appendices<sup>1</sup> to the Scoping Report 2011.
- 2.2 A Framework of SA Objectives and decision-aiding questions was developed from the key issues identified in 2011 as part of the scoping work. This framework aims to promote and/or protect sustainability factors that are relevant to the Local Plan area and its timescale for implementation. It forms the basis against which emerging elements of the Local Plan are appraised using both quantitative and qualitative assessment respectively from the evidence base and professional judgment.
- 2.3 The Scoping Report set out the process undertaken and it was published on the Council's website in March 2011 and subject to consultation with the statutory bodies and the public. As a result of the responses received, the SA Framework of Objectives was reviewed to ensure that it was fit for purpose and up to date. The revised SA Framework was published in the Initial SA Report in August 2012. Following the consultation period on the Revised Development Strategy and Interim SA Report in June 2013, further changes were made to the SA Framework to reflect a representation received from the Environment Agency. An additional decision-aiding question and indicator relating to the Water Framework Directive was added to SA Objective 9 (To create good quality air, water and soils).
- 2.4 The SA Framework of Objectives, Decision-Aiding Questions and Potential Indicators revised as a result of statutory and public consultation is set out in the following table (*including cross-references in italics for the topics in the SEA Directive and key requirements in the NPPF*):

**Table 2.1: SA Framework**

Objective	Key Questions	Indicators
<p>1. To have a strong and stable economy</p> <p>• <i>SEA Directive topics: population &amp; health</i></p> <p>• <i>NPPF paras</i></p>	<p>Will it help meet the employment needs of the local community?</p> <p>Will it help diversify the economy in general?</p> <p>Will it enhance the vitality and viability of the town centre?</p> <p>Will it encourage or enable inward</p>	<p>1. Amount of employment land with planning permission by type</p> <p>2. Percentage of enterprises in knowledge intensive services (i.e. creative and digital industries, high value manufacturing, ICT, financial, professional and public services)</p> <p>3. Amount of completed employment floor space by type</p> <p>4. Level of unemployment in Warwick District</p> <p>5. Potential Indicator - Number / percentage of</p>

<sup>1</sup> [http://www.warwickdc.gov.uk/downloads/download/379/helping\\_shape\\_the\\_district\\_-\\_sustainability\\_appraisal](http://www.warwickdc.gov.uk/downloads/download/379/helping_shape_the_district_-_sustainability_appraisal)



18-22	investment? Will it promote investment in future prosperity (for example by supporting R&D, small businesses and/or encouraging skills development)?	working age population in employment 6. Number of working age population claiming workless benefits by type 7. Number of new business registrants per annum 8. Amount of completed retail, office and leisure floorspace 9. Number of Super Output Areas within the top percentiles of skills deprivation nationally 10. Young people not in education, employment and training (NEET)
2. To enable a range of sustainable transport options  • SEA Directive topics: air, climatic factors, health • NPPF paras 29-41	Will it encourage the use of public transport, walking or cycling? Will it help reduce traffic congestion?	11. Number of bus and train passenger journeys (NB: This indicator may not be collected in the future) 12. Percentage of people aged 16 to 74 who travel to work via ○ bicycle and foot ○ bus and train 13. Traffic speed in main towns (NB: This indicator may not be collected in the future)
3. To reduce the need to travel  • SEA Directive topics: air, climatic factors, health • NPPF paras 29-41	Will it reduce the overall need to travel?	14. Average annual daily traffic flows in main towns NB: This indicator may not be collected in the future. 15. Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and major health centre 16. Potential Indicator - Distance to nearest local shopping centre 17. Percentage of households within set distances of key services via the road network
	Will it help reduce the need to travel by car / lorry?	18. Potential Indicator - Average distance travelled to fixed place of work 19. Percentage of people aged 16 to 74 who travel to work via car
4. To reduce the generation of waste and increase recycling  • SEA Directive topics: soil, health, biodiversity • NPPF para 5	Will it encourage the management of waste in line with the waste management hierarchy, giving first priority to reducing waste, followed by reuse and recycling, then other forms of energy recovery and lastly disposal? . Will any residual disposal be undertaken in the least environmentally detrimental manner?	20. Total amount of waste per head of population 21. Percentage of total waste per head that is recycled 22. Percentage of total waste per head that is composted
5. To ensure	Does it optimise the	23. Densities of developed dwellings

<p>the prudent use of land and natural resources</p> <ul style="list-style-type: none"> <li>• <i>SEA Directive topics: biodiversity, flora, fauna and soil</i></li> <li>• <i>NPPF paras 17, 79-92 &amp; 111</i></li> </ul>	<p>use of previously developed land and buildings? Will it minimise development on Greenfield land? Will it reduce the amount of derelict, degraded or underused land? Does it make efficient use of existing physical infrastructure (i.e. instead of requiring new infrastructure to be built)? Does it encourage resource-efficient design and/or construction (in terms of water and/or raw materials)? Does it encourage the use of materials from alternative and renewable sources?</p>	<p>24. Percentage of dwellings on previously developed land (i.e. new and converted buildings) 25. Amount of developed employment land by type which is on previously developed land 26. Potential Indicator - Proportion of homes being built to Code Levels 4,5 and 6</p>
<p>6. To protect and enhance the natural environment</p> <ul style="list-style-type: none"> <li>• <i>SEA Directive topics: biodiversity, flora, fauna and landscape</i></li> <li>• <i>NPPF paras 109-125</i></li> </ul>	<p>Will it protect and enhance species, habitats and sites designated for their nature conservation interest? Will it safeguard and/or enhance the character of significant landscape areas?</p>	<p>27. Changes in areas and populations of biodiversity importance (AMR). 28. Potential Indicator - Planning applications decided within (in part) or adjacent to a Local Wildlife Site or potential Local Wildlife Site 29. % of SSSIs in Favourable or Unfavourable Recovering condition (Natural England). 30. Potential Indicator - Achievement of Biodiversity Action Plan targets (CSW LBAP Partnership) 31. Potential Indicator - Area of highly sensitive historic landscape characterisation type(s) which have been altered and their character eroded 32. Potential Indicator - % of planning applications where archaeological mitigation strategies (preservation by design and / or archaeological recording) were developed and implemented 33. Potential Indicator - % of planning applications for which archaeological investigations were required prior to approval</p>
<p>7. To create and maintain safe, well-designed, high quality built environments</p> <ul style="list-style-type: none"> <li>• <i>SEA Directive topics: landscape,</i></li> </ul>	<p>Will it help provide a sense of identity and local distinctiveness? Will it protect or enhance the setting of the town? Will it promote design that enhances townscapes? Will it protect or</p>	<p>34. Satisfaction with your neighbourhood as a place to live 35. Potential Indicator - Development complying with Secured By Design guidelines</p>

<p><i>cultural heritage</i></p> <ul style="list-style-type: none"> <li>• NPPF paras 56-68</li> </ul>	<p>improve safety in built environments?</p>	
<p>8. To protect and enhance the historic environment</p> <ul style="list-style-type: none"> <li>• SEA Directive topics: <i>cultural heritage</i></li> <li>• NPPF paras 126-141</li> </ul>	<p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value?</p> <p>Will it encourage appropriate use of and/or access to buildings and landscapes of historical/cultural value?</p>	<p>36. Number of listed buildings (by grade) on English Heritage's buildings/sites 'at risk' register</p> <p>37. Number of scheduled ancient monuments on English Heritage's 'at risk' register</p> <p>38. Number of registered Parks and Gardens on English Heritage's 'at risk' register</p> <p>39. Investment in listed buildings – value added by grant schemes</p> <p>40. Proportion of Conservation Areas protected by article 4 designation</p> <p>41. Number of Conservation Areas covered by an up to date Conservation Area Statement (reviewed within the last 5 years)</p>
<p>9. To create good quality air, water and soils</p> <ul style="list-style-type: none"> <li>• SEA Directive topics: <i>soil, water, air</i></li> <li>• NPPF paras 109-125</li> </ul>	<p>Will it affect local air quality?</p> <p>Will it affect air quality in the Air Quality Management Areas?</p> <p>Will it minimise pollution of soils?</p> <p>Will it minimise light and noise pollution levels?</p> <p>Will it retain the best quality agricultural land?</p> <p>Will it minimise adverse effects on ground and surface water quality?</p> <p>Will it prevent deterioration of water quality as measured by the Water Framework Directive?</p>	<p>42. Extent of Air Quality Management Areas</p> <p>43. Air quality concentration levels</p> <p>44. Water Framework Directive measures of water quality in local rivers</p> <p>45. Potential Indicator - Major development (over 1000 sqm or 10 dwellings) located in areas of Grades 1, 2 and 3a agricultural</p>
<p>10. To minimise the causes of climate change by reducing greenhouse gases and increasing the proportion of energy generated from renewable and low carbon sources.</p>	<p>Will it reduce overall energy use through increased energy efficiency?</p> <p>Will it reduce or minimise greenhouse gas emissions?</p> <p>Will it increase the proportion of energy generated from renewable and low carbon sources?</p>	<p>(43). Air quality concentration levels</p> <p>46. Renewable energy installed by type</p> <p>47. Per capita carbon emissions</p> <p>48. Potential Indicator - Proportion of electricity produced via renewable resources</p> <p>(26) Potential Indicator – Proportion of new homes built to code levels 4, 5 and 6</p> <p>49. Potential Indicator - Commercial development built to BREEAM good and excellent</p>

<ul style="list-style-type: none"> <li>• <i>SEA Directive topics: air, climatic factors</i></li> <li>• <i>NPPF paras 93-99, 120</i></li> </ul>		
<p>11. To adapt to the predicted impacts of climate change including flood risk</p> <ul style="list-style-type: none"> <li>• <i>SEA Directive topics: water, climatic factors</i></li> <li>• <i>NPPF paras 93-104</i></li> </ul>	<p>Will it reduce or minimise the risk of flooding? Will it minimise sensitive development in medium and high risk flood zones?</p>	<p>50. Estimated number of addresses located in level 2 or 3 flood zones 51. Planning applications decided in areas of flood risk (zones 2 and 3) by development type 52. Potential Indicator - Number of planning applications incorporating SUDs 53. Potential Indicator - Surface water run off indicator</p>
<p>12. To meet the housing needs of the whole community (ensuring the provision of decent and affordable housing for all, of the right quantity, type, size and tenure)</p> <ul style="list-style-type: none"> <li>• <i>SEA Directive topics: population, health</i></li> <li>• <i>NPPF paras 47-55</i></li> </ul>	<p>Is it enabling the housing target to be met? Does it provide for the development of balanced communities by encouraging an appropriate mix of housing (in terms of type, size and tenure)? Will it reduce homelessness and housing need? Will it reduce the number of empty homes?</p>	<p>54. Net additional dwellings for the current year 55. Five year supply of housing 56. Affordable housing completions 57. Number of households on local authority housing waiting list 58. Homeless households in priority need in temporary accommodation 59. No. of private dwellings empty for more than 6 months per 1000 dwellings 60. Housing affordability - ratio of lower quartile house price to lower quartile earnings</p>
<p>13. To protect, enhance and improve accessibility to local services and community facilities</p> <ul style="list-style-type: none"> <li>• <i>SEA Directive topics: population, health</i></li> </ul>	<p>Will it maintain and enhance existing community facilities? Will it put unacceptable pressure on existing services and community facilities? Will it improve access to local services and facilities for the whole community?</p>	<p>61. Number of eligible open spaces managed to Green Flag award standard 62. Percentage of District Council owned public buildings with access and facilities to people with disabilities (17) Percentage of households within set distances of key services</p>

<ul style="list-style-type: none"> <li>• <i>NPPF paras 23-27 &amp; 69-78</i></li> </ul>		
<p>14. To improve health and well being</p> <ul style="list-style-type: none"> <li>• <i>SEA Directive topics: health</i></li> <li>• <i>NPPF paras 69-78</i></li> </ul>	<p>Will it promote healthy lifestyles? Will it provide and improve access to health and social care services? Will it provide and/or enhance the provision of open space? Will it improve opportunities to participate in the district's cultural, sport and recreational opportunities?</p>	<p>63. Male/Female Years of Life lost per 10,000 population Male/female life expectancy at birth 64. Percentage of residents taking 30 minutes or more moderate exercise five times per week 65. Highest and lowest ranked SOAs for health deprivation and disability 66. Number of households within 300m, 2km &amp; 5km of 2ha, 20ha and 100ha accessible natural greenspace (ANGst) respectively 67. Potential Indicator - Amount of unrestricted greenspace per 1000 population</p>
<p>15. To reduce poverty and social exclusion</p> <ul style="list-style-type: none"> <li>• <i>SEA Directive topics: population, health</i></li> <li>• <i>NPPF paras 69-78</i></li> </ul>	<p>Will it reduce poverty and social exclusion in those areas most affected?</p>	<p>68. Proportion of working age population claiming workless benefits 69. Index of multiple deprivation (rank of super output areas)</p>
<p>16. To reduce crime, fear of crime and antisocial behaviour</p> <ul style="list-style-type: none"> <li>• <i>SEA Directive topics: population, health</i></li> <li>• <i>NPPF para 69</i></li> </ul>	<p>Will it reduce actual levels of crime?  Will it reduce the fear of crime?  Will it reduce / discourage anti-social behaviour?</p>	<p>70. Fear of crime by type</p> <ul style="list-style-type: none"> <li>• home broken into and having something stolen</li> <li>• being physically attacked by strangers</li> <li>• having their car stolen</li> </ul> <p>71. Recorded crime rates by type</p> <ul style="list-style-type: none"> <li>• Violent crime</li> <li>• Vehicle crime</li> <li>• Domestic burglary</li> <li>• Criminal damage</li> </ul> <p>72. Recorded Antisocial Behaviour Rates 73. Percentage of respondents that have a 'high' perceived level of antisocial behaviour in their local area</p>

## SA Method

- 2.5 This SA Framework formed the basis for appraising the strategic options for the level and distribution of growth as well as reasonable options for sites from 2011 through to 2014. The baseline information was updated in 2012, 2013 and 2014 and the PP Review updated in 2013 and 2014; the issues for the Local Plan area remained the same and the SA Framework was still relevant and retained for continuity of appraisal. The summary of the updated baseline and plans and programmes review can be found in Section 3 with the detail provided in Appendices II and III.

- 2.6 During the early stages 2011-2012 of SA and Local Plan preparation, the SA used a system of symbols to represent the findings of the SA for different elements of the emerging plan as follows:

**Table 2.2: SA Key to Nature and Significance of Effects (2011-2012)**

Strongly positive	++	2
Positive	+	1
Neutral	=	0
Negative	-	-1
Strongly negative	--	-2
Unknown	?	0

**Table 2.3: Compatibility Analysis Key (2011)**

Symbol	Description
✓	Positive
X	Negative
O	Neutral
?	Uncertain

- 2.7 Amendments to the significance key were made in May 2013, in order to make the identified sustainability effects of the Local Plan clearer. The 'scoring' aspect of the previous SA method has been removed as it can often be misinterpreted and draw the focus away from the identified significant effects.
- 2.8 The revised significance key used for the SA of Strategic Options; Potential Site Allocations and Potential Village Site Allocations is presented in Table 2.3 below:

**Table 2.4: Revised Significance Key.**

Categories of Significance		
Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
=	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive
+	-	SA Objectives 2, 5, 6, 13 and 14 consider more than one topic/issue and as a result there is the potential for different effects upon each topic considered. For example, Objective 2 has decision-aiding questions that relate to encouraging the use of public transport, walking and cycling as well as reducing traffic congestion. Development could have a negative effect on traffic; however, it could also improve public transport or provide new cycle/walking routes with a positive effect. Therefore, two symbols would be shown.

- 2.9 For Compatibility Analysis of the Publication Draft Local Plan Vision and Objectives (amended and refined since 2011):

**Table 2.5: Revised Compatibility Analysis Key.**

<b>O</b>	Neutral
<b>++</b>	Very Compatible
<b>+</b>	Compatible
<b>?</b>	Uncertain
<b>-</b>	Incompatible
<b>--</b>	Very Incompatible

- 2.10 Throughout the SA process, the appraisal was proportionate to the stage of the developing Local Plan and the elements of the plan that were being appraised.

### **Strategic Options**

- 2.11 Reasonable strategic options for the level and distribution of growth were subject to high level strategic SA against each SA objective in 2011, 2012 and 2013. The findings of this work is summarised in Section 4 with the detail provided in the Scoping Report (2011), Initial SA Report (2012) and Interim SA Report (2013), which are all available on the Council's website<sup>2</sup>. The appraisal carried out in 2013 provided a commentary describing the potential effects and possibilities for mitigation of any adverse effects or enhancements of positive effects. Any changes to the overall level or distribution of growth proposed in the Local Plan since the Revised Development strategy consultation in 2013 have also been considered in Section 4.

### **Potential Site Allocations**

- 2.12 Reasonable site options were subject to high level strategic SA against each SA objective in 2012 by the Council using the key presented in Table 2.2. The findings of this work are provided in the Initial SA Report (2012)<sup>3</sup>. Further appraisal work was then undertaken by Enfusion in 2013 to consider reasonable options for site allocations. The options were subject to SA against each SA objective using the key presented in Table 2.4. The findings for each reasonable site option were set out in individual detailed matrices - evidence was cited where applicable, a commentary was provided and suggestions for mitigation or enhancement were made where relevant. The nature of the likely sustainability effects (including positive/negative, duration, permanent/temporary, secondary, cumulative and synergistic) were described, together with any uncertainty noted.
- 2.13 Following consultation on the Revised Development Strategy in June 2013 and updates to evidence there have been changes to the site options

<sup>2</sup> [http://www.warwickdc.gov.uk/info/20410/new\\_local\\_plan](http://www.warwickdc.gov.uk/info/20410/new_local_plan)

<sup>3</sup> [http://www.warwickdc.gov.uk/downloads/download/384/preferred\\_options\\_-\\_sustainability\\_appraisal](http://www.warwickdc.gov.uk/downloads/download/384/preferred_options_-_sustainability_appraisal)

considered through the Local Plan. The boundaries and/ or capacity for some of the site options previously considered through the SA have changed as well as there being a number of new sites that have not yet been subject to appraisal. Enfusion has carried out an appraisal of all new reasonable site options using the method set out in Para 2.16 above and key presented in Table 2.4. Any significant changes to sites options previously considered through the SA in 2013 have been addressed by updating the individual appraisal matrices for those sites. For completeness, the detailed appraisal of all reasonable strategic site options is presented in Appendix V of this SA Report, with a summary of the findings presented in Section 4.

### **Potential Village Site Allocations**

- 2.14 The Council carried out a high level appraisal of seven Category 2 Villages in 2012 against each SA objective using the key presented in Table 2.2. The findings of this work were presented in the Initial SA Report published in June 2012<sup>4</sup>. Following further evidence base and site appraisal work the Council identified a number of reasonable options for village sites. The reasonable site options for each settlement were subject to SA against each SA objective in 2013 using the revised key presented in Table 2.4.
- 2.15 Detailed appraisal matrices were provided for each of the primary and secondary service villages to ensure that the cumulative effects (positive and negative) of proposed village site options were sufficiently considered. Any significant effects relating to individual village site options were identified within the appraisal commentary for each of the villages, thus satisfying the requirement for reporting the “significant” likely effects in accordance with the SEA Directive. The appraisal was undertaken using professional judgment, supported by the baseline information (SA Scoping Report 2011) and further updated evidence gathered as part of the Council's site selection method, as well as any other relevant information sources available. Sustainability Appraisal is informed by the best available information and data; however, data gaps and uncertainties exist and it is not always possible to accurately predict effects at a strategic level of assessment.
- 2.16 The symbols provided in the appraisal matrices relate to the cumulative effect of the proposed site options for that primary or secondary service village rather than each individual village site option. As previously stated, any significant effects for individual village site options are noted within the appraisal commentary. The SA has taken a consistent approach to the appraisal of village site options, any assumption or thresholds used are presented in the table below.

**Table 2.6: SA of Potential Village Site Allocations - Assumptions and Thresholds**

SA Objective	Assumptions and Thresholds	
1. To have a strong and stable economy	++	Positive effects considered unlikely as no employment land will be delivered.
	+	
	=	Assumed no employment will be provided by proposed village sites and that most people will travel to the larger

<sup>4</sup> [http://www.warwickdc.gov.uk/downloads/download/384/preferred\\_options\\_-\\_sustainability\\_appraisal](http://www.warwickdc.gov.uk/downloads/download/384/preferred_options_-_sustainability_appraisal)



		settlements.
	?	Proposed sites in that village contain current employment uses which could be lost; however, the precise nature of proposals is not yet known so the effect is considered uncertain.
	-	Negative effects are not considered likely; the loss of
	--	existing employment is addressed above.
2. To enable a range of sustainable transport options		Distance from public transport as well as potential impacts on traffic are considered against this SA Objective. It is assumed that development at any of the village site options will increase traffic.
	++	Majority of proposed sites in village have access to bus stop within 0 - 400m and/or access to train station within 1km.
	+	Majority of proposed sites in village have access to bus stop within 400 - 800m.
	=	Development is unlikely to have a positive or negative effect.
	?	No evidence relating to capacity of existing highway network.
	-	Majority of proposed sites in village have access to bus stop within 800 - 1,600m and/ or traffic flow problem or other transport issue identified by Transport Assessment (2012).
	--	Access to bus stop greater than 1,600m and/ or traffic flow problem or other transport issue identified by Transport Assessment (2012) <sup>5</sup> and/or more than 80 dwellings <sup>6</sup> proposed if all options were progressed and developed.
3. To reduce the need to travel	++	Development would significantly reduce the need to travel. This is considered unlikely as the proposed sites are in villages.
	+	Development would reduce the need to travel. This is considered unlikely as the proposed sites are in villages.
	=	A neutral effect is considered unlikely.
	?	An uncertain effect is considered unlikely.
	-	Assumed there will be a need to travel to other villages or towns to obtain access to employment as well as services and facilities to meet the majority of peoples' needs. Minor long-term negative effect for all village sites and minor negative cumulative effects for all villages.
	--	Major negative effects considered unlikely, as sites are being identified in primary and secondary service villages.
4. To reduce the generation of waste and increase recycling	++	Positive effects considered unlikely as development will
	+	lead to an increase amount of waste produced.
	=	Neutral effect considered unlikely as development will lead to an increase amount of waste produced.
	?	An uncertain effect is not considered likely, please see below.
	-	Assumed that all village site options will have a minor long-term negative effect negative through the generation of waste with the potential for minor long-term negative cumulative effect for all villages.
	--	Major negative effects considered unlikely given the scale of development.

<sup>5</sup> Warwickshire County Council and Highways Agency (March 2012) Warwick District Council Local Development Framework Core Strategy Strategic Transport Assessment Overview Report.

<sup>6</sup> Guidance threshold that would require the production of a Transport Assessment and Travel Plan as set out in the Department For Transport's Guidance on Transport Assessment (March 2007).

5. To ensure the prudent use of land and natural resources	Land type and water protected areas are considered against this SA objective.	
	++	All potential sites are Brownfield Land.
	+	Majority of sites are either entirely or predominantly Brownfield Land.
	=	A neutral effect is not considered possible.
	?	Land type is unknown and no evidence relating to water protected areas.
	-	<ul style="list-style-type: none"> <li>Development would lead to the loss of Greenfield land.</li> <li>Site[s] within a Surface Water Safeguarded Zone and/or Groundwater Source Protection Zone.</li> </ul>
6. To protect and enhance the natural environment	--	<ul style="list-style-type: none"> <li>Development would lead to the loss of Green Belt Land.</li> <li>Site[s] within a Surface Water Drinking Water Protection Area 'at risk' or 'probably at risk' and/or Groundwater Drinking Water Protected Area 'at risk' or 'probably at risk'.</li> </ul>
	The natural environment includes landscape and biodiversity.	
	++	Development has the potential for major positive effects on the landscape and/or biodiversity. Development would need to directly address an existing issue with regard to landscape and/or biodiversity.
	+	Development has the potential for positive effects on the landscape and/or biodiversity.
	=	Neutral effect on landscape and biodiversity is considered unlikely.
	?	The landscape and ecological value of the site[s] is not known.
	-	<ul style="list-style-type: none"> <li>Development proposed in area of low to medium or medium landscape value.</li> <li>Development proposed in area of low to medium or medium ecological value.</li> <li>Development could have impacts on locally designated biodiversity adjacent to proposed village sites, includes, Local Wildlife Sites and Biodiversity Action Plan Habitats.</li> </ul>
	--	<ul style="list-style-type: none"> <li>Development proposed in area of medium to high or high landscape value.</li> <li>Development proposed in area of medium to high or high ecological value.</li> <li>Protected species present.</li> <li>Development could have impacts on internationally or nationally designated biodiversity.</li> </ul>
7. To create and maintain safe, well-designed, high quality built environments	++	Development directly addresses an existing issue with regard to the built environment.
	+	The NPPF requires that all development should achieve high quality and inclusive design, establish a strong sense of place, respond to local character and create safe and accessible environment. It is therefore assumed that all proposed sites can achieve this with minor positive effects on the built environment.
	=	Neutral effect considered unlikely given the requirements of the NPPF.
	?	Uncertain effect considered unlikely given the requirements of the NPPF.
	-	A proposed site goes against the Village Design Statement

		or Parish Plan.
	--	Development would have major negative effects on the built environment.
8. To protect and enhance the historic environment	++	Development directly addresses an existing issue with regard to the historic environment.
	+	Development has the potential for positive effects on the historic environment.
	=	Development is unlikely to have either a positive or negative effect on the historic environment.
	?	No heritage assets on or adjacent to proposed sites and archaeology unknown.
	-	Development at a proposed site could have an indirect effect on a Scheduled Monument, Listed Building and/or Conservation Area including their setting.
	--	Development at proposed sites could have a direct effect on a Scheduled Monument, Listed Building and/or Conservation Area.
9. To create good quality air, water and soils	++	Development at the site[s] would directly address an existing issue with regard to air, water and soil quality.
	+	Development at the site[s] has the potential for positive effects on air, water and soil quality.
	=	Development at the site[s] is unlikely to have a positive or negative effect on air, water and soil quality.
	?	The potential effects of development at the site[s] are uncertain.
	-	<ul style="list-style-type: none"> <li>It is assumed that development at all the village sites have the potential for a minor long-term negative effect against this SA Objective.</li> <li>Site[s] within a Groundwater Vulnerability Zone.</li> </ul>
	--	<ul style="list-style-type: none"> <li>Site[s] adjacent to or in close proximity to sewerage treatment plant, airport, main road (Motorway or A road) and/ or railway line.</li> <li>Site[s] located on historic landfill site.</li> <li>Development would lead to the loss of best and most versatile agricultural land.</li> <li>Site[s] have been identified as potentially being contaminated<sup>7</sup>.</li> </ul>
10. To minimise the causes of climate change by reducing greenhouse gases and increasing the proportion of energy generated from renewable and low carbon sources.	++	Major positive effects are considered unlikely as development would need to reduce greenhouse gas emissions and provide renewable or low carbon energy. It is assumed for all sites that development will increase levels of traffic.
	+	Minor positive effects are considered unlikely as it is assumed for all sites that development will increase levels of traffic and therefore greenhouse gas emissions.
	=	A neutral effect is considered unlikely as it is assumed for all sites that development will increase levels of traffic and therefore greenhouse gas emissions.
	?	An uncertain effect is considered unlikely as it is assumed for all sites that development will increase levels of traffic and therefore greenhouse gas emissions.
	-	A minor negative long-term effect assumed for all proposed development sites and cumulatively for villages

<sup>7</sup> Warwick District Council Environmental Health Team

		as a result of increased traffic.
	--	Given the capacity of the sites it is considered unlikely that site[s] will have a major negative effect.
11. To adapt to the predicted impacts of climate change including flood risk	++	Development at the site[s] would directly address existing flooding risk.
	+	Development at the site[s] has the potential for positive effects on flood risk.
	=	Site[s] not in an area of medium or high flood risk.
	?	Flood risk information not available.
	-	Site[s] have identified surface water drainage issues.
	--	Site[s] located within Flood Zones 2 or 3.
12. To meet the housing needs of the whole community (ensuring the provision of decent and affordable housing for all, of the right quantity, type, size and tenure)	++	Assumed that all proposed sites have the potential for a positive effect on housing with major long-term positive cumulative effects for rural communities.
	+	Assumed that all proposed sites have the potential for a positive effect on housing.
	=	See above.
	?	See above.
	-	See above.
	--	See above.
13. To protect, enhance and improve accessibility to local services and community facilities	++	Development would lead to the provision of facilities and services.
	+	Development has the potential to support existing services and facilities.
	=	Development unlikely to have positive or negative effects on services and facilities.
	?	Assumed that all proposed sites have the potential to both support and increase pressure on existing services and facilities. The capacity of existing services and facilities is unknown, therefore the effect is considered uncertain.
	-	No existing services and facilities within village and none being delivered as part of development.
	--	Development would lead to the loss of existing facilities and services.
14. To improve health and well being	++	Existing healthcare facility present in village.
	+	<ul style="list-style-type: none"> <li>Assumed that all proposed sites have the potential for indirect positive effects on health through the provision of housing.</li> <li>Site[s] within 300m of natural greenspace<sup>8</sup>.</li> </ul>
	=	No existing healthcare facility in village but good/excellent access to public transport.
	?	No information on existing healthcare facilities and public transport.
	-	No existing healthcare facility in village and poor access to public transport.
	--	Development would lead to the loss of an existing healthcare facility.
15. To reduce poverty and social exclusion	++	See + below.
	+	Assumed that all proposed sites have the potential for indirect positive effects through the provision of housing, therefore potential for indirect positive cumulative effects

<sup>8</sup> Warwick District Council (2010) Accessible Natural Greenspace standards.  
<http://www.warwickdc.gov.uk/NR/rdonlyres/2168A53B-62DA-47EF-9A5D-2589AF448308/0/AN1LOCALSITES.pdf>

		for each village.
	=	See + above.
	?	See + above.
	-	See + above.
	--	See + above.
16. To reduce crime, fear of crime and antisocial behaviour	++	See ? below.
	+	See ? below.
	=	See ? below.
	?	The potential effect of development for all the proposed sites on crime is uncertain at this stage. The effects on crime will depend on the design and layout finalised at the development management level.
	-	See ? above.
	--	See ? above.

- 2.17 The method and findings for the SA of potential village site options was presented alongside the Village Housing Options and Settlement Boundaries Document for public consultation in November 2013<sup>9</sup>. In response to the representations received and updated evidence there have been some changes to the potential village sites, which includes new sites. The appraisal matrices have been updated to reflect these changes and are presented in Appendix VI. The changes to village site allocation options and how they have been considered through the SA are presented in Appendix VII of this Report.

### **Publication Draft Local Plan**

- 2.18 The SA of Publication Draft Local Plan, including policies, is structured under 10 topic headings, which have been linked to Objectives in the SA Framework as well as topics in the SEA Directive. This provides a framework and structure to evaluate the likely significant effects of the Publication Draft Local Plan against these key topics. The appraisal of each topic has been divided into a number of sub-headings to ensure that each aspect of the emerging Local Plan (Policies and Site Allocations) is considered as well as the interrelationships between topics and cumulative effects of the Plan as a whole.
- 2.19 The appraisal was undertaken using professional judgment, supported by the updated baseline information and further updated evidence for the Local Plan, as well as any other relevant information sources available. The nature of the likely sustainability effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) are described, together with any uncertainty noted. Evidence is cited where applicable and a commentary provided and suggestions for mitigation or enhancement made where relevant. Sustainability Appraisal is informed by the best available information and data; however, data gaps and uncertainties exist and it is not always possible to accurately predict effects at a strategic level of assessment.

<sup>9</sup> [http://www.warwickdc.gov.uk/info/20410/new\\_local\\_plan](http://www.warwickdc.gov.uk/info/20410/new_local_plan)

### **Uncertainties and data gaps**

- 2.20 It is not always possible to accurately predict sustainability effects when considering plans at such a strategic scale. Impacts on biodiversity and cultural heritage, for example, will depend on more detailed information and studies at a site-level. Whilst climate change science is becoming more accurate, it is difficult to predict impacts likely to result from climate change, including synergistic effects. These uncertainties have been acknowledged in the appraisal, baseline and other areas of this SA Report where applicable.

### **Consultation on the SA**

- 2.21 The SEA Directive/ Regulations require that the public shall be given an early and effective opportunity within appropriate timeframes to express their opinion on the draft plan and accompanying environmental report before the adoption of the plan.
- 2.22 The SA has been subject to public consultation at the scoping stage in 2011 and with the Initial SA Report (June 2012) that accompanied the Developing the Preferred Option Document in 2012. In addition, further consultation has taken place on the Interim SA Report (June 2013) that accompanied the Revised Development Strategy in 2013. The responses to consultation on the SA scoping are recorded in the Initial SA Report (June 2012). The responses to the Initial SA Report (June 2012) and the Interim SA Report (June 2013) made available at the time of preparing this SA Report are recorded in Appendix VIII.
- 2.23 This SA Report will be published on the Council's website [www.warwickdc.gov.uk](http://www.warwickdc.gov.uk) and sent to statutory consultees and other relevant stakeholders.
- 2.24 Consultation remains an important part of the ongoing and iterative SA process; therefore, any responses received will be considered and views integrated into the final SA Report to accompany the Local Plan at Submission.

## 3.0 Sustainability Context and Objectives

### Introduction

- 3.1 Since the production of the Scoping Report in 2011, the baseline and the review of plans and programmes has been updated to reflect the current evidence. This Section builds on the scoping work carried out in 2011 and provides a summary of the updated baseline information with reference to the likely evolution without the plan and summary of the relationships between the Local Plan and other relevant plans and programme. It also provides an over view of the sustainability characteristics of the Local Plan area and sets out the key issues, problems and opportunities for sustainable development and spatial planning identified from the analysis of the evidence.

### Review of Relevant Plans and Programmes

- 3.2 In order to establish a clear scope for the SA of the Publication Draft Local Plan, it is necessary (and a requirement of SEA) to review and develop an understanding of the wider range of *policies, plans, programmes and sustainability objectives*" <sup>10</sup> that are relevant to the Local Plan. This includes International, European, National, Regional and local level policies, plans and strategies. Summarising the aspirations of other relevant policies, plans, programmes and sustainability objectives (hereafter referred to as 'relevant plans') promotes systematic identification of the ways in which the Local could help fulfil them.
- 3.3 A review of relevant plans and programmes was undertaken during the SA/SEA scoping stage in accordance with the requirements of the SEA Directive, this included considering the wider plans reviewed as part of the development of the evidence base for the Local Plan. The policy context and relationship with other plans and programmes was presented in Appendix 2 of the SA Scoping Report published in March 2011<sup>11</sup>. An update to the PP review was carried out by Enfusion in 2013 and 2014 to inform the appraisal of the Revised Development Strategy and Publication Draft Local Plan. The plan and programme review including the updates is presented in Appendix III of this Report.

### Baseline Collection

- 3.4 Collection of baseline information is required under SEA legislation, and is fundamental to the SA process to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the District and providing the basis for predicting and monitoring effects of the Local Plan. To make judgements about how the emerging content of the plan will progress or hinder sustainable development, it is essential to understand the economic, environmental and social circumstances in the District today and

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<sup>10</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents ODPM, November 2005

<sup>11</sup> [http://www.warwickdc.gov.uk/downloads/download/379/helping\\_shape\\_the\\_district\\_-\\_sustainability\\_appraisal](http://www.warwickdc.gov.uk/downloads/download/379/helping_shape_the_district_-_sustainability_appraisal)

their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the District to allow the potential effects of the Local Plan to be adequately predicted.

- 3.5 The SA/ SEA Guidance provided by Government<sup>12</sup> proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the SA process guides plan making and as new information becomes available.
- 3.6 SA/ SEA Guidance advises that, where possible, information should be collated to include:
- 'comparators' - (i.e. the same information for different areas) - as points of reference against which local data may be compared;
  - established targets, which will highlight how far the current situation is from such thresholds; and
  - trends - to ascertain whether the situation is currently improving or deteriorating.
- 3.7 Baseline information was collated and reviewed during the SA/SEA scoping stage in 2011 and presented in Appendix 1 of the Scoping Report<sup>13</sup>. It gathered together national, regional and local data to enable assessment of the current situation within the District. Targets and standards at international, national and local level are reviewed to provide the necessary context and to facilitate the focussing of resources into areas of non-compliance or significant failure. The baseline information was updated in 2012, 2013 and 2014 to inform the appraisal of the Preferred Options, Revised Development Strategy and Publication Draft Local Plan. The updated baseline information is presented in Appendix II of this Report. A summary of the updated baseline information is provided below along with the characteristics of the Local Plan area.

## **Sustainability Context and Baseline Information**

### **Economy and Employment (including education)**

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#### ***What's the situation now?***

#### ***Economy and employment***

- 3.8 Despite the economic downturn the Districts economy has remained in a strong position relative to Warwickshire and the UK as a whole. It is characterised by continued low levels of unemployment and the highest

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<sup>12</sup> Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

<sup>13</sup> [http://www.warwickdc.gov.uk/downloads/download/379/helping\\_shape\\_the\\_district\\_-\\_sustainability\\_appraisal](http://www.warwickdc.gov.uk/downloads/download/379/helping_shape_the_district_-_sustainability_appraisal)



GVA per head in Warwickshire. The long term outlook is that the District will continue to perform better than the West Midlands

- 3.9 The economy of the district stood at £3.2 billion in 2011 outperforming the West Midlands and UK in the period leading up to the recent recession. The total number of people employed in the district in 2011 was 90,351 (Cambridge Econometrics 2013). Between 2000 and 2008 the economy grew by 3.75% compared to 1.5% pa and 2.5% pa in the West Midlands and the UK respectively. Employment grew by 1.75% compared with 0.5% in the West Midlands and 1% in the UK. Since the start of the recession in 2008 employment in the district has reduced slightly but by less than 0.25%. In contrast to the West Midlands and UK there has been little impact on economic output (GVA)
- 3.10 In terms of the structure of the Districts economy the largest employment sector is professional services (11,600 in employment in 2011) which is focused in Leamington. The top ten sectors make up 81% of the employment in the district. There is a concentration of food and drink manufacturers in Leamington but these have not performed well in the recession
- 3.11 The labour market of Warwick District is characterised by a strong skills profile, above average economic participation and above average wages. In 2011 GVA per job (measure of economic productivity) was £36,400 -3% below UK average but 7% above West Midlands average. It is acknowledged that despite having a cluster of knowledge based industries actual output across the district is less than would be expected nationally. This is one of the issues the LEP would like to address through its City Deal proposal and Strategic Economic Plan
- 3.12 Warwick District has seen significant investment in sites, which has helped drive growth and prosperity in this area, including sites such as Warwick Technology Park, Tachbrook Business Park, Warwick Gates and Tournament Fields (which houses the European headquarters of Gerberit – a world leader in advanced plumbing and plastics technologies). While the district is the strongest performing economic area of the sub-region (in terms of GVA per head)<sup>14</sup>, some parts of the transport network in this area are at capacity, leading to congestion and unreliable journey times at peak hours. This could result in higher costs for businesses, which can affect overall competitiveness, and might constrain future economic growth of the area<sup>15</sup>.
- 3.13 The District's economy is characterised by its strength in knowledge intensive industries (over 28.2% of all enterprises), i.e. those that are intensive users of ICT technologies and have high shares of highly educated labour<sup>16</sup>. Similarly, the District has a much greater proportion of people employed (57 %) in 'knowledge occupations' compared to the regional and national average. It is generally believed that jobs in the knowledge economy are likely to be more secure than those which require low skills and therefore easier to export.

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<sup>14</sup> Source: Warwickshire County Council (2013) Quality of Life Report in Warwickshire 2013/14

<sup>15</sup> Source: Coventry Council and Warwickshire County Council (2011) Coventry & Warwick Economic.

<sup>16</sup> Source: Warwickshire County Council (2012) Quality of Life Report in Warwickshire 2012/13

- 3.14 The proportion of people unemployed in the District has also consistently been lower than the county and national figures. The latest figures from June 2013 show that 1,472 residents were claiming job-seekers allowance, representing 1.6% of the working age population<sup>17</sup>. This has improved since 2011 where 2.3% of the working age population were claiming<sup>18</sup>. However, there is considerable variation within the district with some areas experiencing unemployment rates just below 6%. Worklessness is a less familiar term than unemployment and is used to describe all those of working age who are not employed and are claiming a benefit, i.e. jobseekers allowance, incapacity benefit, and income support. In the district, approximately 6,000 people of the working age population are claiming benefits with the majority claiming ESA and incapacity benefits.<sup>19</sup>
- 3.15 The District has the strongest underlying growth expected for personal service and sales occupations followed by associate professions and the number of managers and proprietors, and professionals is also expected to increase, but at a similar rate to overall employment growth<sup>20</sup>. Conversely, it has a below average and falling proportion of its residents in 'skilled trades occupations', possibly a reflection of the decline of the manufacturing sector with the loss of firms such as Ford, Potterton and Benford from the District. However, manufacturing firms do still retain a strong presence in the District although there is a shift towards more knowledge based hi-tech manufacturing, with a particular emphasis within the automotive industry.
- 3.16 The number and proportion of young people aged 16-19 years who are not in education, employment or training has decreased in Warwickshire between 2005/06 and 2012/13<sup>21</sup>. Figures for the District for the last 2 years were slightly higher than the proportion covered for Warwickshire as a whole. In 2012, work placed based earnings were at £26,989 which was slightly above the county and national averages although this figure has fallen slightly since 2011.

### **Education and Skills**

- 3.17 The District has seen a steady increase in the number of pupils who achieved five or more GCSEs at grades A\*- C including English and Maths between 2007 and 2012. Just under 70% of pupils achieve these grades which is well above the averages for Warwickshire and England as a whole. Also the 2011 data suggest that 38.4% of the usual resident aged 16 and over has attained a degree level of higher qualification with an additional 3.3% in apprenticeships. These figures are significantly higher compared to Warwickshire and the national average as a whole.

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<sup>17</sup> Source: Warwickshire County Council (2013) Quality of Life Report in Warwickshire 2013/14

<sup>18</sup> Source: Office Of National Statistics (2011) Neighbourhood Statistics - 2011 Census

<sup>19</sup> Source: Warwickshire County Council (2013) Quality of Life Report in Warwickshire 2013/14

<sup>20</sup> Source: GL Hearn Limited (2012) Economic and Demographic Forecasts Study for Warwick District Council & Coventry City Council.

<sup>21</sup> Source: Warwickshire county Council (2012) Quality of Life Report 2013/14

## Retailing and Town Centres

- 3.18 Warwick District has a network of centres, each offering a range of shops and services to the local population. A summary of the current situation and health of these centres is as follows:
- 3.19 Leamington Spa town centre is considered to be a relatively healthy town centre. The breadth of its current retail offer is broadly in line with other higher order centres in the UK. It has department store representation and a good range of national multiple retailers are present. These all serve an important anchor function to the centre, because they continue to bring shoppers into the town centre. The vitality and viability of the centre is underpinned by:
- the healthy list of operators seeking representation in the centre;
  - steady prime Zone A rentals; and
  - an environmentally attractive shopping environment.
- 3.20 However there are concerns about:
- fall in retail floor space since 2008
  - fall in the UK Venuescore rankings;
  - the loss of an independent department store operator, Woodward's;
  - the level of vacant outlets and floorspace;
  - the limited scale of substantial new development in the centre during the past two decades.
- 3.21 Leamington Spa's retail performance and prospects cannot be divorced from those of competing centres. In this context the town centre competes at a sub-regional level with Coventry and Solihull, and with the regional centre at Birmingham. All of these centres have seen the implementation of major retail and leisure schemes, which has resulted in Leamington Spa losing its competitive edge due to the limited amount of investment in new retail facilities in the town centre.
- 3.22 Kenilworth is perceived as a healthy town centre catering for the local catchment and visitors alike and is performing well at its level in the shopping hierarchy. Positive indicators include:
- that it is anchored by a good food store offer
  - a good range of national multiple retailers present;
  - an increase in rental levels;
  - low vacancy and the centre;
  - environmentally attractive; and
  - no obvious negative crime perception.
- 3.23 Furthermore, the centre's profile and trading performance have been significantly enhanced by the new investment associated with the redevelopment of Talisman Square, anchored by Waitrose. Sainsbury's to the south of the town centre also acts as an important anchor and generator of

linked trips. The evidence indicates that the existing shopping provision in the town centre has benefitted from the Talisman Square redevelopment.

- 3.24 Kenilworth town centre will never compete with the higher order centres for comparison trade, especially in the fashion sector. Therefore its future performance and prospects will depend on its ability to meet local needs efficiently. Fundamentally, at this level in the shopping hierarchy the maintenance and enhancement of the food shopping function is of paramount importance. If people shop for food locally, they may be inclined to resist other destinations for non-food visits and other retailers in the centre are therefore supported. Now that Kenilworth's shopping function is better anchored, its overall prospects for the future are enhanced.
- 3.25 Despite the centre's current health, there are concerns as to the limited amount of investment in traffic management in the centre, which could result in the town losing its competitive edge and attractiveness.
- 3.26 Generally speaking, Warwick town centre accommodates a good range of middle to upmarket independent and leisure service operators catering for shoppers and tourists alike. This is in contrast to neighbouring Leamington Spa, which is more functional and predominantly governed by national multiple retailers selling mainstream fashion. In this way, it can be argued that these neighbouring shopping destinations complement each other.
- 3.27 Given that Warwick does not have a wide range of national multiples, especially comparison retailers, it is considered that that the important anchor function to the centre as a whole is served by the strong service sector.
- 3.28 Whilst there is no specific evidence to point to a picture of fragility or decline in the health of Warwick town centre, the limited degree of retailer interest and the recent decline in pedestrian footfall does not point to a vibrant and robust centre. This, together with the limited scale of new investment in the centre, leads to the view that whilst the centre is vital, it is not particularly viable in terms of attracting new development and investment. Moreover, and in practical terms, given the proximity of Leamington Spa, it is likely that the town centre will continue to lose trade to the dominant centres in its hinterland, especially in terms of expenditure in fashion goods. The present comparison retail offer of the town centre is unlikely therefore to be significantly improved.
- 3.29 Warwick District also has a large number of smaller local centres, shopping parades and isolated shops. These include small clusters of shops in historic parts of the towns and planned shopping parades developed as towns have expanded. All these locations play an important role in providing shops and services within easy walking distance of many people. Although the vast majority of shops are within the urban area, a number of the district's villages also contain local shops although their number has decreased in recent years.

### ***What will the situation be without the new Local Plan?***

- 3.30 The anticipated growth of the local population of the district will place greater demands for employment, school places, childcare provision, retail and investment in the retail sector although this may be tempered by a fall in the working age population.
- 3.31 The situation without the plan may result in:
- negative effects the economic growth of the District as it would reduce businesses' and investors' confidence to expand or locate in the area. Uncontrolled or sporadic development might harm the environment and/or impact on local infrastructure capacity which may impact on the attractiveness of the area for economic growth.
  - a lack of co-ordination between where new employment development takes place and where it is needed to address areas of unemployment and worklessness or in the types of jobs required to meet the skills of the existing population. This may place increasing demands on transport infrastructure, which includes areas outside of the District.
  - a lack of co-ordination between where new development takes place and where investment in schools, colleges, nursery and childcare provision is focussed. The lack of co-ordination may also result in delays to the timing of when improvements are made which may affect the delivery of development, or result in a lack of places or overcrowding in existing schools. The absence of a Local Plan may also impact on the ability to make bids for public funds, attract private sector money, and for assembling land for education projects. Increasing demands on schools may also coincide with a period of pressure to reduce public spending on both infrastructure and services.
  - investment not being directed towards the town and local centres, retail development may take place in other less sustainable locations which may reduce demand for existing centres and reduce their attractiveness to shoppers, retailers and investors.

## **Climatic Factors**

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### ***What's the situation now?***

- 3.32 The most current data shows that carbon emissions per capita within the District reduced between 2005 and 2011 and that transport was the largest contributor. This trend is consistent with the rest of Warwickshire, the West Midlands and England as a whole.

**Table 3.1: Per Capita Local Carbon Emissions Estimates for (kt/CO<sub>2</sub>)<sup>22</sup>**

Year	Total per capita emissions	Industry and commercial	Domestic	Road transport
2005	9.4	415.2	333.1	511.1

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<sup>22</sup> Department for Energy and Climate Change (2014)  
<https://www.gov.uk/government/publications/local-authority-emissions-estimates>

2006	9.4	424.6	333.7	513.1
2007	9.0	381.0	324.3	517.0
2008	8.7	373.7	321.7	496.2
2009	7.9	323.3	287.4	474.6
2010	8.1	338.1	307.7	472.6
2011	7.6	301.9	272.4	472.8

- 3.33 In terms of energy consumption the data below (Table 3.2) shows that consumption across the three main consuming categories has decreased between 2005 and 2011<sup>23</sup>. This implies that energy efficiency may have increased in the District through technological advances and energy efficiency schemes driven by the government but this also could be partly attributed to the economic downturn. Improving energy efficiency continues to be an important objective.

**Table 3.2: total final energy consumption for Warwick District**

Year	Industrial and commercial (GWh)	Domestic (GWh)	Transport (GWh)	Total (GWh)
2005	1,151.7	1,246.6	1,790.6	<b>4,191.6</b>
2006	1,109.3	1,221.0	1,815.3	<b>4,148.8</b>
2007	1,007.8	1,194.5	1,821.2	<b>4,027.0</b>
2008	980.6	1,155.8	1,791.3	<b>3,931.5</b>
2009	909.0	1,079.8	1,714.1	<b>3,706.8</b>
2010	923.7	1,075.0	1,687.0	<b>3,689.7</b>
2011	857.6	1,029.3	1,679.1	<b>3,570.4</b>

- 3.34 The Council's Low Carbon Action Plan 2012 sets out a framework for Reducing Carbon Dioxide Emissions and Improving Energy Efficiency across Warwick District. It has identified opportunities to reduce carbon emissions in Warwick District by 12% (128,000 tCO<sub>2</sub> per year) over the next 15 years towards meeting the national target of reducing 2009 levels by 25% by 2027
- 3.35 To deliver this, a series of schemes and initiatives have been identified in three broad areas: energy efficiency projects in buildings, use of low and zero carbon technologies for generating energy locally and transport. It is recommended that the Council set up a Low Carbon Task Force to take responsibility for the delivery of these projects. The Council is currently considering how to take forward the recommendations of the report
- 3.36 Overall analysis of current and projected energy use in the District shows that the biggest opportunity and need is to address energy use in existing buildings. Existing private sector housing is responsible for around 91% of total emissions within the domestic buildings sector. However, new development will increase consumption and it is anticipated that the Council's preferred growth option will result in an increase in district wide carbon emissions of between 1 and 4% over the next 15 years. National requirements for the

<sup>23</sup> Department for Energy and Climate Change (2014) <https://www.gov.uk/government/statistical-data-sets/total-final-energy-consumption-at-regional-and-local-authority-level-2005-to-2010>

construction of new buildings through building regulations mean that the scope to improve on this at the local level over the long term may be limited

### ***What will the situation be without the new Local Plan?***

- 3.37 Projections for climate change in the West Midlands based on medium emissions scenarios suggest hotter, drier summers, warmer wetter winters and more extreme weather events as follows<sup>24</sup>:

**Table 3.3: Future predicted temperature and precipitation**

<b>Temperature</b>	<b>2020</b>	<b>2050</b>	<b>2080</b>
mean temperature (°C)	0 to 2	2 to 3	3 to 4
<b>Precipitation</b>	<b>2020</b>	<b>2050</b>	<b>2080</b>
Winter mean precipitation %	0 to 10	0 to 20	0 to 30
Summer mean precipitation %	0 to -10	-10 to -20	-10 to -30

- 3.38 The anticipated growth of the local economy and population of the District will increase the demand for energy and heating which could increase reliance on fossil fuels and make targets to reduce carbon emissions more difficult to achieve. In the future the risk of finite resource scarcity could mean energy demands cannot be met if alternative renewable and low carbon sources are not developed. The situation without the new Local Plan would mean measures to reduce overall energy consumption and increase the use of renewable and low carbon technologies might not be implemented and this would make it difficult to meet national carbon emission targets. The absence of a new Local Plan would also make it more difficult to implement measures to ensure new development adapts to the predicted effects of climate change, which may have consequences for the local population and businesses, as well as the built and natural environment.

## **Cultural heritage**

### ***What's the situation now?***

- 3.39 The District has a rich history which has left a legacy of fine historic buildings and places, including castles of national importance at Warwick and Kenilworth. Warwick District contains over 1,500 statutory listings which account for 2,145 separate addresses, many of which are of national importance<sup>25</sup>. Of those listed buildings, 4 are recognised as being at risk namely Baginton Castle, Goodrest Lodge (Leek Wootton), Old Castle Bridge (Warwick), and the Masters House (Warwick)<sup>26</sup>. There are 11 parks and gardens of special historic interest<sup>27</sup> which cover 4% of the District's land area, of which two are considered to be at risk namely Guy's Cliffe and Stoneleigh Abbey<sup>28</sup>. There are a further 29 historic parks and gardens designated of

<sup>24</sup> Environmental Agency (2010) West Midlands State of Environment

<sup>25</sup> Source: Warwick District Council (2014) Historic Building Guidance – Listed Buildings and Conservation Areas

<sup>26</sup> Source: English Heritage (2014) Heritage at Risk Register

<sup>27</sup> Source: English Heritage (2014) Heritage List

<sup>28</sup> Source: English Heritage (2014) Heritage at Risk Register

local importance<sup>29</sup>. The District also contains 41 Scheduled Monuments, 13 of which are considered to be at risk. In addition, there are 29 designated Conservation Areas<sup>30</sup> covering approximately 4% of the District's land area. The historic environment therefore makes a significant contribution to the District and is in generally good condition. This contributes to the strong perception that Warwick District is a high quality environment overall, but there are pockets where the environment is not as high quality and needs to improve. Nine out of ten residents were satisfied with their local area as a place to live in 2009/10<sup>31</sup>.

### ***What will the situation be without the new Local Plan?***

- 3.40 The quality of the historic and built environment makes an important contribution to the success of the district's economy. Without these attributes, the towns and villages would have considerably less charm and appeal as places to work, live or visit. In the absence of a new Local Plan, there is a risk that the quality of the historic and built environment deteriorates as a result of developments and changes to places which do not preserve what is important locally in terms of listed buildings, parks and gardens, and conservation areas.
- 3.41 Poor quality development can have a detrimental effect on the appearance of an area, which can affect the desirability of a place to live and work. This can potentially discourage private sector investment in repairing and maintaining buildings and spaces, and if not addressed can lead to a spiral of decline in an area. This may result in an increase in the number of buildings, sites and Conservation Areas 'at risk'.
- 3.42 It is also important to preserve the local distinctiveness of the district in its towns, villages and rural areas. This is what makes the place attractive to residents and visitors. This also applies to landscapes which, if sporadic development was allowed as a result of the lack of a local plan, could be lost or severely damaged.

## **Communities and Health**

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### ***What's the situation now?***

#### ***Health***

- 3.43 The District and Warwickshire as a whole can be seen as generally being healthy. The following bullet points illustrate the general health profile of Warwick<sup>32</sup>:
- The District is below the national averages for deaths caused by all cancers, respiratory diseases and mental behaviour disorders although it

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<sup>29</sup> Source: Warwick District Council (2014) Information from Officers

<sup>30</sup> Source: Warwick District Council (2014) Historic Building Guidance – Listed Buildings and Conservation Areas

<sup>31</sup> Source: Warwickshire Partnership Place Survey 2009/10

<sup>32</sup> Source: Warwickshire county Council (2012) Quality of Life Report 2013/14



has a higher number of deaths from heart diseases than the national average and Warwickshire as a whole.

- Trends in age standardised cancer mortality rates in those aged under 75 has been decreasing in Warwickshire with rates lower than the national average.
- Smoking attributable mortality in Warwick is significantly better than the national and regional averages.
- The prevalence of overweight and obese children, 2011-2012 in Warwick is lower than that recorded in the West Midlands and England as a whole. However, one ward in Warwick has a statistically significantly higher prevalence of obese Year 6 age children than Warwickshire as a whole.
- The rates admissions to hospital for alcohol related harm of such in Warwickshire (1,975 admissions per 1,000 population) are lower than either the regional (2,285 admissions per 100,000 population) or national rates.
- The Proportion of carers providing unpaid care for 50 or more hours per week, has increase from 15% in 2001 to about 17% in 2011 which is in line with an overall trend in growth across England. However the figures are significantly lower for the District compared to Warwickshire and England as a whole.

- 3.44 In terms of measuring well-being, Warwick District emerged as having a smaller number of areas where people are estimated to have low well-being in Warwickshire as a whole. The top three Lower Super Output Areas (LSOAs) in Warwickshire which could be considered the 'happiest' are all in Warwick District, in particular the LSOAs of Milverton North (Leamington Spa), Glass House and Windy Arbour (Kenilworth) and Leek Wootton, Guys Cliffe and Beausale (Warwick/Leamington). However, the 'worst' performing LSOA in Warwickshire was found in the District in Lillington East.

### ***Open Space and Cultural Facilities***

- 3.45 Warwick District contains a large number of open spaces which vary in terms of type, quality and size. These include formal sports fields, parks and gardens, nature reserves, informal recreation areas, children's play areas, allotments, rivers, canals, cemeteries and woodland. In total, there is over 1,775 hectares of open space within the district, with just less than 700 hectares being unrestricted and publicly accessible<sup>33</sup>. There are 461 greenspaces across Warwick District and of these 67% had unrestricted access for public use.
- 3.46 Currently there is a total of 14 sports halls in Warwick on 11 sites and the standard of provision of courts per 10,000 population in Warwick is the lowest of the 5 local authorities in Warwickshire<sup>34</sup>. It is also below the West Midlands region standard of 3.97 badminton courts per 10,000 population and below the England wide standard of 4.01 courts per 10,000 population<sup>35</sup>.

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<sup>33</sup> Source: Parks and Open Spaces Audit 2008

<sup>34</sup> Source: Sport England (2012) Sport England's Facilities Planning Model. Warwick District Council. Provision for Sports Halls

<sup>35</sup> Source: Sport England (2012) Sport England's Facilities Planning Model. Warwick District Council. Provision for Sports Halls

- 3.47 There is also a wide range of arts and cultural facilities within the District, including theatres, cinemas, libraries, galleries and visitor attractions, such as Warwick Castle. In addition, there are a number of nationally recognised events and festivals including Warwick Words and Folk Festivals.
- 3.48 The District also contains a number of national cycle routes as well as a number of local routes including<sup>36</sup>:
- National Route 52 runs north from Warwick through Coventry, Nuneaton and Coalville to link with National Route 6 just west of Loughborough
  - National Route 523 travels between Kenilworth and Burton Green
  - National Route 41 of the National Cycle Network is a long distance route that when complete will connect Bristol, Gloucester, Stratford-upon-Avon and Rugby.

### ***Social and Economic Deprivation***

- 3.49 National statistics which measure relative deprivation have highlighted five general localities in Warwick District which are amongst the most deprived 20% or 30% of areas in England<sup>37</sup>. These include Lillington East, Brunswick South East and South West, and Packmores West.
- 3.50 There have been a considerable number of targeted interventions in the Brunswick and Crown wards in Leamington in recent years and significant improvements made in narrowing the gaps. These include targeting public and voluntary services such as health, education, youth, community safety and child care with the emphasis on children and families. Such targeted efforts are now being expanded to take in some of the estates in Warwick where pockets of deprivation exist.
- 3.51 Also five rural localities in the District are ranked amongst the most deprived 10% in the country in terms of barriers to housing and to services. The Council supports the Rural Community Council which is in turn supporting Parish Councils to produce Parish Plans and/or Housing Needs Surveys.

### ***Community Safety***

- 3.52 In 2012/ 2013 there were 52.18 per 1000 population were recorded crimes in the district<sup>38</sup>. Warwick District has the lowest recorded crime rates and the highest Anti-Social Behaviour Order and Criminal Anti-Social Behaviour Order (ASBO and CRASBO) incident number rates in the County<sup>39</sup>. Out of all recorded crime in the District 'violent crime' was the highest. However, since 2003 all forms of recorded crime have decreased.
- 3.53 Warwickshire Police have carried out a rationalisation of their operating stations and posts. There is only one station in Leamington Spa which is open to the public. Police officers attend surgeries in venues across the District.

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<sup>36</sup> Sustrans (2014) National Cycle Route Map

<sup>37</sup> Warwick District Council (2013) Annual Monitoring Report

<sup>38</sup> Source: Warwickshire county Council (2012) Quality of Life Report 2013/14

<sup>39</sup> Source: Warwickshire county Council (2013) Quality of Life Report 2013/14

Warwickshire Fire and Rescue currently have two stations within the district, a full time station at Leamington and a retained stations at Kenilworth<sup>40</sup>.

### ***What will the situation be without the new Local Plan?***

#### ***Health***

- 3.54 The increasing proportion of elderly people is a major challenge in Warwickshire - increased life expectancy brings with it an increase in the number of people in need of health and social care. In addition, a number of changes to the way in which health and social services are delivered are likely to take place over the period of the plan. Where such changes have land use implications, the process of planning and delivering the new services will be less efficient without a long term spatial plan which is able to co-ordinate future needs in terms of service delivery centres.
- 3.55 Where new housing development takes place, there will be a corresponding increase in the demand for health and social services. Without a plan, the providers will be unable to forecast this future demand and make the appropriate decisions to meet it. In terms of urban extensions, there would be no mechanism to ensure that facilities to meet the increased demand will be provided within the developments. The health, social and specialist housing needs of an increasing number of older people may not be adequately met.

#### ***Open Space and cultural facilities***

- 3.56 The anticipated growth of the local economy and population of the District will inevitably place greater demands on existing open space, sports and cultural facilities. Those increasing demands may also coincide with a period of pressure to reduce public spending on both facilities and services.
- 3.57 Without the new Local Plan, there is a risk that new housing and business developments may result in the loss of existing open space, or missed opportunities to secure qualitative or quantitative enhancements to existing leisure and cultural facilities across the District. Opportunities for people to participate in sports and enjoy the arts within the district may also diminish without the co-ordination of public and private sector investment. The absence of a Local Plan may impact on the ability to make bids for public funds, attract private sector money, and assemble land for leisure and cultural projects.

#### ***Social and economic deprivation***

- 3.58 New development can deliver new housing, including affordable housing, employment, and associated infrastructure and services. Without a plan this would not necessarily be located in areas which can benefit areas of social and economic deprivation. In addition, in rural areas, housing pressures may continue to grow but new housing would not necessarily be targeted towards

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<sup>40</sup> Warwickshire county council (2014) Fire Stations Map

meeting local needs and supporting services. In the absence of a Local Plan, areas of deprivation may therefore deteriorate within the District.

## **Crime**

- 3.59 The continued growth of the District will place greater pressure on community safety services. This could result in potentially more crimes being committed, a rise in antisocial behaviour and possibly the fear of crime. Demands on the fire and rescue service could also increase. For both services, increasing congestion could result in longer response times. An increasing pressure on growth and development in the district may occur at a time when there is pressure to reduce public spending on community safety services. The situation without the new Local Plan, may lead to new development being located in areas which cannot easily be served by the police or fire services, or designed without community safety in mind which can help reduce crime and the perception of it.

## **Housing**

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### ***What's the situation now?***

- 3.60 Housing in Warwick District is concentrated within the towns of Warwick, Leamington Spa, Whitnash and Kenilworth – approximately 88% of the District's population live in the urban areas<sup>41</sup>. The housing market in the district has been particularly buoyant in the recent past with housing growth rates amongst the highest in the region. The estimated population of the District at 2012 of 138,600 represents an increase of 12% since 2001 (124,000)<sup>42</sup>. Between 2004 and 2009, the District had the highest level of population growth in the West Midlands region.
- 3.61 The District includes a wide range of housing which, compared with the rest of Warwickshire, includes higher than average proportions of flats and privately rented homes. Despite this, however, the district had a median property price of £251,775 in 2013<sup>43</sup>, well above the county and regional averages. This has led to problems of affordability, particularly for young people, many of whom have to leave the district to access housing which they can afford to buy. In 2012, the District had an affordability ratio of 7.65<sup>44</sup> which was the second highest in Warwickshire.
- 3.62 A recent Housing Assessment<sup>45</sup> has indicated an annual need for 268 affordable homes. This is above likely (or realistic) levels of housing delivery, and has arisen from under-provision of affordable housing for a decade or more and due to a housing moratorium between 2006 and 2009. Since 2001-2, affordable housing delivery has averaged 85 dwellings a year (18% of total

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<sup>41</sup> Source: Office for National Statistics Mid 2011 Population Estimates for Super Output Areas

<sup>42</sup> Source: Warwickshire County Council (2013) Quality of Life Report 2012 - 2013

<sup>43</sup> Source: Communities and Local Government Live Tables: Median House Prices from Land Registry Data 2013 (Third Quarter)

<sup>44</sup> Source: Warwickshire County Council (2013) Quality of Life Report 2012 - 2013

<sup>45</sup> Source: GL Hearn (2013) Coventry and Warwickshire Joint Strategic Housing Market

house building) but this has been offset by losses of affordable housing through right-to-buy sales. Overall between 2001 and 2013 the number of affordable housing completion per annum have fallen from 177 to 71. Over this period, housing need increased. In addition between 2004/05 and 2012/13 the number of households accepted as being homeless and in priority need has reduced with the greatest number recorded in 2004/05. The lowest number recorded was in 09/10 but the number has almost tripled since then.

- 3.63 Warwick District has a relatively young population compared with the national profile with a particularly high proportion of young people in the 20-39 age range. This is partly explained by the proximity of the University of Warwick, many of whose students choose to live in the District's towns, particularly Leamington Spa. At the same time, however, the District is a popular choice of residence for more affluent families with employment ties in the wider sub-region.
- 3.64 The national trend of growing numbers of older people is equally applicable to Warwick District. Current population projections show that the proportion of people aged 75 and over will increase by 39% from 2011 to 2021<sup>46</sup>. Older people are increasingly more likely to live independently for longer and this will impact on the suitability of housing to meet their specific needs.
- 3.65 Large areas of the district are unsuitable for new housing due to the presence of historic buildings, parks and gardens, nature reserves and areas liable to flood. The area of the district to the north of Warwick and Leamington is currently designated as Green Belt.
- 3.66 A study looking at the Local Needs and Historic Demands for Gypsy and Traveller Sites in Warwick District found that demand was low and transitory in nature in the district<sup>47</sup>. Even given the highest average number of days spent in the district this is no higher than 12 days. The average number of vans per visit is less than 9. The Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) to identify the need within the District, which was published in November 2012. The assessment demonstrated that there is a need for 31 permanent pitches to be provided over a 15 year period (25 within the first five years and in addition 6-8 transit pitches over the full 15 years)<sup>48</sup>.

#### ***What will the situation be without the new Local Plan?***

- 3.67 In the absence of a new Local Plan, there will not necessarily be sufficient homes to meet the needs of newly-forming households, those wishing to move to the area for work and those wishing to move to more suitable accommodation.

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<sup>46</sup> Source: Office for National Statistics: 2008-based Population Projections

<sup>47</sup> Warwick District Council (2011) Evidence of Local Needs and Historic Demand for Gypsy and Traveller Sites in Warwick District Report by Planning Policy and Housing Strategy teams at Warwick District Council

<sup>48</sup> Lisa Scullion and Philip Brown (2012) Salford Housing & Urban Studies Unit, University of Salford. Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment. Warwick District Council.

- 3.68 New homes will not necessarily be located in places which are close to jobs, services, and public transport and community facilities or in areas where development does not harm areas of acknowledged importance such as Nature Reserves or Historic Parks and Gardens. The right types, sizes and tenures of homes to meet needs will not necessarily be built.
- 3.69 Without plans for new medium to large housing developments, there will be very limited opportunities to provide affordable rented and Home buy (shared ownership) homes and to properly plan for the necessary infrastructure such as schools and doctors surgeries.
- 3.70 There will be limited opportunities to meet the housing needs of the whole population, such as young people, families and older people, and to ensure that new and existing housing areas offer a high quality, sustainable environment.
- 3.71 If housing needs are not met, this will lead to out-migration as people, particularly young working people, move to find homes in neighbouring areas such as Rugby and Coventry. This reduction in the local workforce could have a damaging effect on the local economy as businesses find it difficult to recruit. There would also be an increase in commuting and potentially a further ageing of the local population.

### **Natural Environment (Landscape, Flora and Fauna and Soils)**

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#### ***What's the situation now?***

- 3.72 Warwick District possesses a natural environment that is regarded as being of a particularly high quality<sup>49</sup>. Broadly speaking there are two types of natural asset that combine to give Warwick District its distinct natural environment. They are:
1. particular landscape characteristics familiar to the locality; and
  2. specific environmental assets including nature conservation/ biodiversity interests, and features of historic value (geologically/geomorphologically important features).
- 3.73 The landscape of the District is a product of the particular geological conditions combined with the impacts of farming practices over the centuries. The majority of the natural landscape falls within either the Historic Arden or Dunsmore landscape character areas. In addition, a large part approximately 20,550 ha<sup>50</sup> of the District is designated as Green Belt.
- 3.74 The District also contains a large number of environmental assets, including features of historic interest, geological/geomorphological significance and

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<sup>49</sup> Source: Warwick District Green Infrastructure Study

<sup>50</sup> Source: Department for communities and Local Government (March 2013) Area of designated Green Belt by Local Authority

particular habitats of nature conservation interest. There are 7 Sites of Specific Scientific Interest (SSSI's)<sup>51</sup>, 8 Local Nature Reserves<sup>52</sup> and significant tracts of woodland deemed to be of ancient origin. There are also many other sites and features that are subject to non-statutory designations that reflect their particular contribution to biodiversity. These include 54 designated Local Wildlife Sites and 175 potential Local Wildlife Sites<sup>53</sup>.

- 3.75 According to Defra's Magic maps (2014), the majority of the District (approximately 60%) consists of grade 3 agricultural land with rest being made up of approximately 20% of grade 2 agricultural land, 1% grade 4 and 5 agricultural land and 14% being classified as urban and non-agricultural land.

### ***What will the situation be without the new Local Plan?***

- 3.76 The quality of the natural environment makes an important contribution to the success of the District's economy. Without these attributes, the towns and villages would have considerably less charm and appeal as places to work, live or visit. In the absence of a new Local Plan, there is a risk that the quality of the natural environment deteriorates as a result of developments and changes to places which do not preserve what is important locally in terms of landscape and areas of ecological interest.
- 3.77 The anticipated growth of the local economy and population of the district will inevitably place greater demands on the natural environment. These increasing demands may also coincide with a period of pressure to reduce public spending on public open spaces. The situation without the new Local Plan would be a lack of co-ordination between where new development takes place and where investment in open space is focussed. The absence of a Local Plan may also impact on the ability to make bids for public funds, attract private sector money, and for assembling land for natural environment projects.

## **Transport and Infrastructure**

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### ***What's the situation now?***

#### ***Transport***

- 3.78 In terms of the strategic road network (i.e. M40, A45 and A46), a number of junctions currently experience congestion and stress at peak periods<sup>54</sup>. This is reported to be having a negative effect on business competitiveness and the attractiveness of the area for inward investment<sup>55</sup>.

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<sup>51</sup> Source: Natural England (2014) Sites of Specific Scientific Interest

<sup>52</sup> Source: Defra (2014) Magic Map – Local Nature Reserve Layer

<sup>53</sup> Source: Warwick District Council (2013) Annual Monitoring Report

<sup>54</sup> Source: West Midlands Strategic Road Network Study: Report for the Highways Agency

<sup>55</sup> Source: DaSTS Improving Connectivity in the Coventry North/South Corridor

- 3.79 Road traffic in Warwickshire has increased at a greater rate compared to the equivalent increases seen in the West Midlands or England and roads in Warwick town centre continue to have the slowest recorded speeds.<sup>56</sup> Traffic flows in each of the three main towns in the district are monitored to establish traffic growth or reduction. Based on 24 hour flows recorded at cordon sites around the towns, traffic flows have fallen in each of the three main towns between 2000 and 2009<sup>57</sup>. However, congestion at peak periods of the day is widely recognised as a problem within Warwick District, particularly within and around the main towns and on key inter-urban routes such as the A452 between Kenilworth and Leamington Spa, and the A445 and A425 routes between Leamington Spa and Warwick.
- 3.80 Congestion is one of the main contributors towards areas of poor air quality within the district. In the District 47.4% of people aged 16-74 travel to work by car/ van where as only 3.2 % travel to work by bus and train with the remainder travelling by bicycle or on foot<sup>58</sup>. In addition, Road transport in Warwick District is also responsible for over 40% of CO<sub>2</sub> emissions contributing towards climate change<sup>59</sup>. In 2011, the average journey time by car was less than 8 minutes for each of the eight key services in Warwick<sup>60</sup>.

### **Utilities**

- 3.81 In Warwick District, Western Power is responsible for electricity distribution at the local level and National Grid Distribution own and operate the lower pressure gas distribution network to household and companies. Other electricity and gas companies, such as Powergen, buy this electricity and gas and supply it to consumers.
- 3.82 The western and central areas of the district have a high number of non gas connected domestic properties. In urban areas, this may be because electricity was favoured at the time the building was being developed, however, in rural areas it is likely that many buildings will be located where it is uneconomical to invest in gas grid connections.

### **What will the situation be without the new Local Plan?**

- 3.83 The anticipated growth of the local economy and population of the district will inevitably place greater demands on the transport system and also the demand for electricity and gas and the infrastructure needed to supply it. If this is not carefully managed it could affect the timing of development. This is likely to result in increased traffic flows, with potentially more congestion, significant delays with a number of junctions exceeding capacity<sup>61</sup>, and also increased demand for public transport services. An ageing population may also put greater demands on public and community transport services to access services. These increasing demands on transport may also coincide

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<sup>56</sup> Source: Warwickshire County Council (2013) Warwickshire Quality of Life Report 2013 - 2014

<sup>57</sup> Source: Warwickshire County Council Draft Local Transport Plan 3

<sup>58</sup> Source: Office of National Statistics (2011) Census data.

<sup>59</sup> Source: Warwickshire County Council Draft Local Transport Plan 3

<sup>60</sup> Source: Warwickshire County Council (2013) Warwickshire Quality of Life Report 2013 - 2014

<sup>61</sup> Source: West Midlands Strategic Road Network Study: Report for the Highways Agency



with a period of pressure to reduce public spending on both infrastructure and services.

- 3.84 The situation without the new Local Plan would be a lack of co-ordination between where new development takes place and where investment in transport is focussed. The lack of co-ordination may also result in delays to the timing of when improvements are made which may affect the delivery of development. The absence of a Local Plan may also impact on the ability to make bids for public funds, attract private sector money, and for assembling land for transport projects and also it would be difficult for utility providers to plan the necessary infrastructure.

## **Air Quality**

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### ***What's the situation now?***

- 3.85 There are currently five active Air Quality Management Areas (AQMA) within the district covering locations across Warwick, Leamington and Kenilworth town centres. These have been designated as a result for the air quality objective for NO<sub>2</sub> not being met. Concentrations continue to be monitored at a number of locations using both automatic monitoring stations and a network of passive diffusion tubes.
- 3.86 An Updating and Screening Assessment completed in 2012 identified that Charles Street in Warwick was at risk of exceeding the NO<sub>2</sub> annual mean objective and as a result a detailed assessment was carried out in June 2013 to determine whether an AQMA should be declared there. The assessment concluded that an AQMA was not required at this location<sup>62</sup>.

### ***What will the situation be without the new Local Plan?***

- 3.87 The anticipated growth of the local economy and population of the district is likely to result in increasing the amount of traffic particularly in the urban areas where the AQMA are designated. Transport assessments undertaken by the Council considered the potential impacts of increased traffic within the AQMA. A more detailed assessment of the potential impacts on the AQMA was carried out and published in November 2013. The Air Quality Assessment (AQA) found that in the short-term, nitrogen dioxide objectives will continue to be exceeded in both the Warwick and Leamington Spa AQMA. It states that concentrations of nitrogen dioxide are predicted to be much lower in 2028 than in 2011 as a result of stringent emissions controls on new vehicles via Euro standards. In 15 years' time these vehicles will make up the majority of cars on the roads in the UK. The AQA also predicts that background concentrations will be substantially reduced in 15 years' time as a result of reductions in various contributing sectors. It should be noted that the findings of the AQA rely on new vehicles meeting the emission control standards coming into force.

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<sup>62</sup> Source: Warwickshire Observatory (2013) Warwickshire Quality of Life Report 2013 - 2014

- 3.88 The situation without the new Local Plan would be that appropriate mitigation would not be available to address impacts on air quality resulting from any increases in new development both employment and/or residential. This could reduce the air quality further in existing AQMAs. It also could result in existing AQMAs being expanded or additional ones being made depending on the location of the new development.

### **Waste and Recycling**

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- 3.89 In 2012/13, the District produced just under 350 kg of waste per head of population which was a significant reduction compared to previous years<sup>63</sup>. The District also produces the lowest amount of waste per head compared to the other local authorities in Warwickshire. Approximately 200 kg of waste per head is recycled and/or composted<sup>64</sup> which means that the District has already reached revised waste framework directive target to recycle 50% of waste from households by 2020 and Warwickshire Waste Strategy 2013.
- 3.90 All waste collected by the local authority is disposed of by Warwickshire County Council, as the waste disposal authority. It is also the responsibility of the County Council to plan for and enable sufficient and timely provision of waste management facilities to meet the identified need. The district currently contains two waste management facilities, namely the household waste recycling centres in Kenilworth and Leamington Spa.
- 3.91 In August 2013 it was announced that waste targets for the end of Warwickshire's Waste Strategy period should be:
1. Aim to reduce residual waste to 311 kg per household per year, by the end of the strategy period (2020).
  2. Aim to achieve aspirational countryside recycling and composting targets of 65% by the end of the strategy period (2020).

### ***What will the situation be without the new Local Plan?***

- 3.92 The anticipated growth of the local economy and population of the district is likely to result in increasing amounts of waste to be collected and disposed of, recycled or composted, and therefore place greater demands on waste infrastructure. The situation without the new Local Plan might be a lack of co-ordination between when and where new development takes place, and what mitigation is put in place to reduce construction and also operation waste and provide recycling facilities. This might result in the district failing to meet targets for dealing with waste and recycling, and result in greater levels of waste being sent to landfill sites.

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<sup>63</sup> Source: Warwickshire County Council (2013) Warwickshire Quality of Life Report 2013 - 2014

<sup>64</sup> Source: Warwickshire County Council (2013) Warwickshire Quality of Life Report 2013 - 2014

## **Water Resources, Water Quality and Flooding**

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### ***What's the situation now?***

#### **Water Resources**

- 3.93 Severn Trent Water is the appointed water company for the district with the responsibility of providing sufficient quantity and quality of water to meet demand whilst minimising the impact on the environment. They are responsible<sup>65</sup> for the operation and maintenance of the existing public foul drainage network and for providing waste water treatment capacity for future domestic development. They are also responsible for the public surface water drainage networks. From 2011, all private sewers and lateral drains that drain to public sewers will transfer into the ownership of the appointed water company removing the burden on householders and allowing for a more integrated sewerage system.
- 3.94 Severn Trent published their water resources management plan to demonstrate how they intend to meet future water demand over the next 25 years. Their overall aim is to maintain and achieve target levels of service whilst minimising impact on the environment by reducing leakage, managing the demand for water and developing new resources.
- 3.95 Improvements to water infrastructure are programmed into the company's capital plan which runs in five year AMP (Asset Management Plan) cycles of which we are currently in AMP5 (2010 – 2015) which seeks to:
- Reduce leakage;
  - Increase the rate of household meter uptake through the promotion of free meter options and targeted policy of metering upon occupant change;
  - Increase water efficiency measures beyond AMP4 levels; and,
  - Maximise use of existing water resources by improving grid connectivity and supply network.

#### **Flooding**

- 3.96 In 2008, it was estimated that there were just under 200,000 people in the West Midlands living in a floodplain with approximately 120,000 properties believed to be at significant risk from flooding<sup>66</sup>. It was estimated by Warwick District Council in 2011 that 1,006 addresses were located in Flood Zone 3 and 2,688 were located in Flood Zone 2. The total number of dwellings located within the District in 2011 was 59,755 and therefore according to the data approximately 6% of the total has a high or medium risk of flooding<sup>67</sup>.
- 3.97 The District contains a number of designated Main Rivers most of which form tributaries of the River Avon: Canley Brook; River Sowe; Finham Brook; River Leam; and River Itchen<sup>68</sup>. All of which provide a source of flooding.

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<sup>65</sup> Source: Section 94 of the Water Industry Act 1991

<sup>66</sup> Source: Environment Agency (2009) Flooding in England – A National Assessment of Flood Risk.

<sup>67</sup> Office for National Statistics (2011) Neighbourhood statistics.

<sup>68</sup> Source: Mouchel (April 2013) Level 1 Strategic Flood Risk Assessment. Warwick District Council.

- 3.98 A Level 1 Strategic Flood Risk Assessment (2013)<sup>69</sup> has been undertaken which identifies the areas currently under threat and the potential for further flood risk due to climate change based on a 20% increase in flow down the watercourse. The assessment showed areas at highest risk followed routes adjacent to rivers and canals. A number of locations within the district are also known to suffer from surface water flooding.

### **Water Quality**

- 3.99 The District lies predominately within the Warwickshire Avon area of the Severn River Basin Management Plan of which, in relation to the requirements of the Water Framework Directive, 11% of water bodies are currently at good ecological status and are expected to remain the same at 2015. A small area of the district lies within the Tame, Anker and Mease area of the Humber RBMP area of which only 3% of water bodies are at good ecological status however this is expected to remain the same.
- 3.100 In terms of waste water infrastructure, there is no existing capacity at the Waste Water treatment works at Finham or Longbridge however Seven Trent Water does not consider this to be a barrier to development as there is physical capacity to increase the works. They also believe there is capacity within the receiving water course to allow further discharge consents in relation to waste water treatment. Network capacity constraints are being appraised by Severn Trent as part of their sewer flooding investment programme.

### **What will the situation be without the new Local Plan?**

- 3.101 Without the new Local Plan, the impact of flooding (which is projected to increase due to climate change) on people and property could increase if development is not directed away from areas of medium and high flood risk. The plan is also needed to ensure new development is designed to ensure surface water is properly managed and does not increase flooding.
- 3.102 The anticipated growth of the local economy and population will place increased demand on water infrastructure both in terms of meeting the potable water requirements and treating waste water. Without the new Local Plan, there may be a lack of co-ordination between development and the delivery of necessary water supply and waste treatment. It is important to ensure that increased demand, such as waste water treatment caused by future development does not cause deterioration in the existing status of watercourses or make it more difficult for the water body to meet 'good ecological status'.

### **The Character of Warwick District**

- 3.103 Warwick is a non-metropolitan District, covering an area of some 283 km<sup>2</sup>. The District lies within the heart of Warwickshire to the south of the city of Coventry

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<sup>69</sup> Source: Mouchel (April 2013) Level 1 Strategic Flood Risk Assessment. Warwick District Council.

and is surrounded on all sides except for the South East by Green Belt. The District comprises four main towns including Royal Leamington Spa, Warwick, Kenilworth and Whitnash with approximately 90% of the district's population live in these urban areas with the remaining 10% living in a number of relatively small villages. . These main centres contain a wide range of different types of housing although there are affordability issues.

- 3.104 The total estimated population in 2011 was 137,700. The population has grown from 124,000 in 2000 - an 11% increase - and is forecast to continue to grow, with potentially a 17% growth over the next 15 years. Compared to other parts of Warwickshire, a higher proportion of the District's population is of working age. The highest rate of projected population growth in the future is expected to be amongst those aged 65 and over.
- 3.105 The District has a diverse population, with a high proportion of non-white British residents (15% of the total population) compared to other Districts in the County. Relative to the West Midlands as a whole, the District has a strong local economy, with a skilled population and higher than average levels of productivity and earnings compared with regional and national averages. There are good road and rail links with surrounding major urban areas.
- 3.106 The District's relative prosperity masks some significant areas of deprivation. In particular, Lillington lies within the most deprived 20% of Super Output Areas nationally. Further, the changing needs of business means that some of the District's traditional industrial areas require regeneration, with many of these areas located alongside the Grand Union Canal in Warwick and Royal Leamington Spa. The District's 40km of canal offer particular opportunities for recreation, regeneration and environmental improvement.
- 3.107 The three main town centres of Royal Leamington Spa, Kenilworth and Warwick provide a focus for retail, leisure and employment. The unique and high quality environments of these town centres has meant that they have been relatively resilient to the recent recession and the competition from online retailing and other retail areas and town centres. Despite this there has been an increase in vacancy rates and a fall in rents in some of parts of the town centres indicating a need to continue to focus investment in these areas.
- 3.108 The District also contains a large number of environmental assets of mainly national or local importance including features of historic interest, geological/geomorphological significance and particular habitats of nature conservation interest. Areas of historic or environmental importance in the District include:
- 7 Sites of Special Scientific Interest
  - 15 Sites of Importance for Nature Conservation
  - 2,145 Listed Buildings
  - 29 Conservation Areas (covering 4% of the District)
  - 11 Registered Parks and Gardens (covering 4% of the District)

- 3.109 Air quality and traffic congestion, particularly in the main towns, are key issues. However, the District produces the lowest amount of waste per head compared to the other local authorities in Warwickshire. In addition, in terms of measuring well-being, Warwick District emerged as having a smaller number of areas where people are estimated to have low well-being in Warwickshire as a whole and the health of residents is generally better than in other areas of the County. The District also has the lowest overall recorded crime rates in Warwickshire.

### **Key Sustainability Issues, Problems and Opportunities**

- 3.110 Key sustainability problems, issues and objectives of relevance to Warwick District have been identified through:

- the review of other relevant Plans and Programmes;
- an analysis of currently available baseline information ;
- preliminary consultations with key stakeholders; and
- consultation responses received after public consultation on the SA Scoping Report (March 2011).

- 3.111 Despite updates to the baseline information and PP Review the key sustainability problems, issues and objectives identified in the Scoping Report (2011) were still found to be relevant and therefore no significant changes were made to the SA Framework. The key sustainability problems, issues and objectives are as follows.

1. The effects of the recent recession and not knowing how the local economy will change in the future.
2. Relatively high house prices limiting local people's ability to buy or rent property in the area, creating the need for more affordable housing for families in towns and villages. Another issue is the need to provide more housing to meet people's needs in the future, particularly those of older people.
3. The economic strength of the town centres of Warwick, Leamington Spa and Kenilworth, and the threat to these from retail and leisure developments elsewhere.
4. The size and condition of existing community facilities and services (particularly schools and health-care facilities) and whether they can meet current and future needs.
5. People's general health and well-being, and the need for people (particularly teenagers and young people) to have access to sport and cultural experiences, such as cinemas and community events.
6. Road congestion and air pollution, particularly around the main junctions along the A46 and M40, the routes into the towns, and within the town centres.
7. The threat of flooding of homes and businesses in some areas, particularly where surface water may flood towns and villages, and the concern that the threat of flooding will increase because of climate change.
8. Areas of poverty in Warwick and Leamington Spa.

9. The pressure for new development threatening the high-quality built and natural environments in the district, particularly historic areas, and the cost of maintaining historic buildings and areas.
10. Crime and the fear of crime, particularly in town centres, and the need to protect the community from harm.
11. The Government's planned High Speed 2 rail line and its possible effects on the area. (The Government is consulting the public separately on this issue.)

## 4.0 SA of Alternatives

### Introduction

- 4.1 The development of plan-making options and the SA/SEA of alternatives have been on-going throughout the production of the Warwick Local Plan and its accompanying SA. Alternatives have been considered from the early stages - from the SA Scoping Report (March 2011) through to the production of this SA Report (April 2014). This section sets out the history of the SA of alternatives and options assessment to date. It summarises how options have been identified, assessed and progressed through different stages of plan-making; it summarises and refers to SAs that have been undertaken and outlines how the findings of these SAs have influenced different stages of the Local Plan.

### Assessment of Alternatives in SA/SEA

- 4.2 The EU SEA Directive<sup>70</sup> requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account “the objectives and geographical scope” of the plan and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance<sup>71</sup> advises that it should be taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan.
- 4.3 Extant SEA guidance<sup>72</sup> sets out an approach and methods for developing and assessing alternatives. This includes acknowledgement of a hierarchy of alternatives that are relevant and proportionate to the tiering of plan-making. Alternatives considered at the early stages of plan-making need not be elaborated in too much detail so that the “big issues” are kept clear; only the main differences between alternatives need to be documented i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation. The hierarchy of alternatives may be summarised in the following diagram:
- 4.4 Recent case law in England has clarified and provided further guidance for current practice on how alternatives should be considered in SA/SEA of spatial and land use plans. The Forest Heath Judgment<sup>73</sup> confirmed that the reasons for selecting or rejecting alternatives should be explained, and that the public should have an effective opportunity to comment on appraisal of alternatives. The SA report accompanying the draft plan must refer to, summarise or repeat the reasons that had been given in earlier iterations of the plan and SA, and these must still be valid.

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<sup>70</sup> <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>71</sup> <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

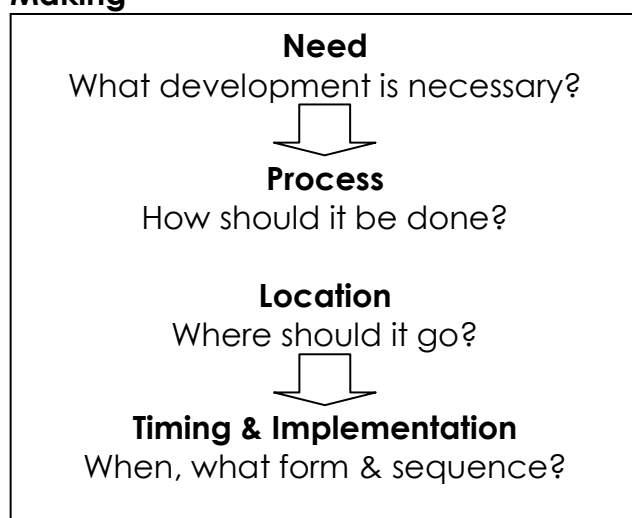
<sup>72</sup> <http://www.pas.gov.uk/pas/core/page.do?pagelid=152450>

<sup>73</sup> Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606



- 4.5 The Broadlands Judgment<sup>74</sup> drew upon the Forest Heath findings and further set out that, although not an explicit requirement in the EU SEA Directive, alternatives should be appraised to the same level as the preferred option; the final SA Report must outline the reasons why various alternatives previously considered are still not as good as the proposals now being put forward in the plan, and must summarise the reasons for rejecting any reasonable alternatives - and that those reasons are still valid. The Rochford Judgment<sup>75</sup> confirmed that the Council had adequately explained how it had carried out the comparative assessment of competing sites and that any shortcomings in the early process had been resolved by the publication of an SA Addendum Report.

**Figure 4.1: Hierarchy of Alternatives in SA/SEA and Options in Plan-Making**



## **SA Findings and Reasons for Selecting/Rejecting Alternatives in the Local Plan**

### ***Issues and Scenarios (March 2011)***

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- 4.6 The Local Plan helping shape the district: Issues and Scenarios Document (March 2011) proposed three broad options for growth in the District, which were as follows:
- **Scenario one** is the lowest level of new development and investment that would be realistic. This option would limit any new development to the levels that we have had during the recent recession. It would only allow development of land that already has permission for building works, and of redundant or vacant land and buildings within the towns and villages (250 homes and 4 hectares of employment land per annum)
  - **Scenario two** is a level of new development and investment which is halfway between scenarios one and three. This would see new

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<sup>74</sup> Heard v Broadland District Council, South Norfolk District Council, Norwich City Council (2012) EWHC 344

<sup>75</sup> Cogent Land LLP v Rochford District Council (2012) EWHC 2542

development return to the levels we had in the later part of the last decade, before the recession (500 homes and 4.5 hectares of employment land per annum)

- **Scenario three** is the highest level of new development and investment that would be realistic. This scenario would return levels of new development to the levels we had during the economic growth in the early part of the last decade which is considered the maximum level likely to be achieved. It would meet forecasts of the amount of new development needed in the future to support the economy, and projections for the district's housing needs based on population and household growth (800 homes and 5 hectares of employment land per annum).

4.7 A 'no growth' option was not considered a reasonable or realistic option at the time because:

- a number of sites already had planning permission;
- there would be no opportunities to meet either the outstanding need for affordable housing, the additional demand arising from the trend for smaller households, or the changing needs of an ageing population;
- there would be limited opportunities for the regeneration of sites which become unused or redundant;
- no housing growth would have an adverse impact upon the growth of the local economy as the national economic situation improves; and
- no growth would be contrary to Government policy.

4.8 The 3 proposed scenarios were subject to SA with the findings presented in the SA Scoping Report (March 2011), which accompanied the Issues and Scenarios Document on public consultation from 17<sup>th</sup> March to 15<sup>th</sup> July 2011. The SA found that against the majority of SA objectives the effects of the scenarios were uncertain as the distribution and exact nature of the development is not yet known. Compared to the other options, it was considered that scenario 3, as the higher growth option, had the potential for the greatest positive effect against SA objectives relating to the economy, sustainable transport, housing and access to local services and facilities. It also found that scenario 3 had the potential for the greatest negative effect against SA objectives relating to the natural environment & landscape, the prudent use of land and air, water & soil quality. Scenario 1 as the lowest growth option was assessed as having the potential for a negative effect on housing and the least positive effect on the economy, sustainable transport and access to local services and facilities. However, it was also assessed as having the potential for less negative effects on the natural environment & landscape, the prudent use of land and air, water & soil quality.

### ***Preferred Options (May 2012)***

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4.9 Following the publication of the Issues and Scenarios Document and the SA Scoping Report the Council undertook further work on the evidence base.

This included the production of a Strategic Housing Market Assessment (SHMA) to determine what level of growth should be taken forward over the plan period. The purpose of the SHMA is to provide a robust and up-to-date understanding of housing need and demand within the District in order to inform and support planning policy and housing strategy.

- 4.10 The SHMA<sup>76</sup> was published in March 2012 and three projections were considered by the Council to be worthy of further consideration because they would support realistic levels of employment and housing growth. The three projections were as follows:

- **Projection 1: Trend Based**

A projection which assumes that recent levels of net migration will continue into the future.

- **Projection 2: Employment Growth**

A projection which takes account of forecast employment growth by looking at what level of net migration would be required to enable this to happen.

- **Projection 3: Employment Growth with Continued Commuting**

This is similar to Projection 2 but allows for a continuation of existing levels of in and out-commuting by the additional employees, rather than balancing new homes and jobs.

- 4.11 Projection 3 was rejected by the Council under further consideration as the increase in jobs would not be matched by an increase in homes. Projections 1 and 2 were considered to be more realistic options in terms of meeting the housing and employment needs of the District. Based on the findings of the SHMA, the Council identified two options for the future level of growth in the District. These were presented in the Local Plan Preferred Options Document (May 2012) as follows:

- **Option 1:** 600 new homes each year (2011 - 2029)

- **Option 2:** 700 new homes each year (2011 - 2029)

- 4.12 These two options were based on new evidence and did not follow on from the scenarios identified at the Issues and Scenarios stage. The two growth options were appraised against the SA Framework with the findings presented in the Initial SA Report (May 2012) which accompanied the Local Plan Preferred Options Document on public consultation from 01<sup>st</sup> June to 03<sup>rd</sup> August 2012. The SA found that option 2 had the potential for a greater positive effect on SA objectives relating to the economy, housing and sustainable transport options. Option 1 was assessed as having the potential for a reduced negative effect on the natural environment & landscape and the quality of air, water & soils compared to option 1. The findings of the SA helped to inform the selection of option 1 as the preferred option. The reasons for the selection of this option and the rejection of option 2 were provided in Section 5 of the Preferred Options Document (May 2012). Option

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<sup>76</sup> Warwick District Council (March 2012) Strategic Housing Market Assessment.

2 was rejected as there was a lack of certainty that a sufficient number of homes on strategic sites could be delivered within the plan period.

4.13 The Council considered four options for the broad location of growth, which were as follows:

- **Option 1:** Focus development outside the Green Belt
- **Option 2:** Distributed around the urban fringe
- **Option 3:** Disperse development in small/medium sites, including around villages
- **Option 4:** New settlement outside the Green Belt

4.14 The four options were appraised against the SA Framework with the findings presented in the Initial SA Report (May 2012) which accompanied the Local Plan Preferred Options Document on public consultation from 01<sup>st</sup> June to 03<sup>rd</sup> August 2012. The findings of the SA are presented in the table below and helped to inform the selection and rejection of options in plan-making.

**Table 4.1: Summary of SA Findings of Options for the Broad Location of Growth (May 2012)**

Broad Options for the Location of growth	Summary of SA Findings presented in the Initial SA Report (May 2012)
Broad Option 1 - Focus development outside the green belt	Would have a positive effect in supporting economic growth. Concentration of sites in one area, close to the urban area, has the potential to support sustainable transport options and reduce the need to travel. However focusing development in one area could have a significant impact on the landscape and the location of sites is more likely to have an impact on the historic environment. Would meet overall housing need but restricted choice in terms of location may mean this option could not meet the needs of all residents.
Broad Option 2 - Distributed around urban fringe	Would have a positive effect in supporting economic growth, sites well related to the urban areas could reduce the need to travel and have the potential to meet all housing needs. Distribution of sites is less likely to have a significant impact on the landscape and historic environment.
Broad Option 3 - Development dispersed in small and medium sites including villages (no large sites)	Sites unlikely to be of a sufficient size to accommodate employment opportunities or support public transport improvements therefore could increase reliance on the private car. Would be more difficult to provide dedicated services, potentially impacting on existing services. Could be harder to provide a mix of housing and affordable housing. However a dispersed approach could potentially minimise impact on the historic environment
Broad Option 4 - New Settlement Outside the Green Belt	Positive impact in terms of supporting economic growth. Critical mass to support new facilities but could still generate a need to travel to access other key services and employment. Would meet overall housing needs however there would be a lack of choice in terms of location.

- 4.15 The Strategic Housing Land Availability Assessment<sup>77</sup> (SHLAA) found that half of potential sites for development (43%) were located outside the Green Belt. These include sites within the existing urban areas and sites to the south of Warwick, Leamington Spa and Whitnash. Based on this evidence the Council considered that Option 1 would lead to the concentration of development within one part of the District and offer no scope for meeting the needs of Kenilworth or villages within the Green Belt. Similar issues were also identified in relation to Option 4.
- 4.16 The Council acknowledged that Option 3 would meet some concerns expressed by the public about the impact of large development sites. However, such a pattern for growth would make it difficult to properly plan for, and deliver, the necessary infrastructure and would be impractical in terms of the number of sites which would have to be identified. Further this pattern of development would make it difficult to make the fullest use of public transport, walking and cycling and make provision for a full range of community facilities with easy access to jobs, schools and other services.
- 4.17 The SHLAA demonstrated that there is limited availability of urban Brownfield land in the District - a capacity of approximately 1,320 dwellings or 11% of the total SHLAA capacity. Therefore, in order to meet the housing requirement, it was considered necessary by the Council to locate development on Greenfield land outside the existing built up areas. In the case of Warwick District, as there is limited availability for urban Brownfield land, extensions to the urban area offered the most sustainable location for growth. For the reasons set out above, Option 2 was selected as the Preferred Option for the location of growth.
- 4.18 The Council developed a number of options for the distribution of housing sites, based on sites assessed through the SHLAA, which was necessary for transport and infrastructure modelling. The apportionment of sites across the District in each option was guided by the following principles:
- maximisation of development on urban Brownfield land where possible to minimise development on Greenfield land;
  - development on the edge of Leamington, Warwick and Whitnash, to both north and south, in order to minimise impact on landscape quality by not concentrating development in one location;
  - greater emphasis on Greenfield land outside the Green Belt rather than within the Green Belt;
  - provision of sufficient development land to meet both the housing and employment needs of Kenilworth; and
  - the avoidance of coalescence of settlements
- 4.19 In each option, the balance of housing would be located in areas such as east of Leamington, the larger villages or the Westwood Heath area south of Coventry. This would enable the transport models to assess the impact of

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<sup>77</sup> Warwick District Council (May 2012) Strategic Housing Land Availability Assessment Main Report.

development in these locations. Four options were identified and are set out in the table below.

**Table 4.2: Options for the distribution of housing sites.**

Location	Option			
	1	2	3	4
Existing Urban Areas*	700	700	700	700
North of Leamington/ Warwick	2,640	1,470	2,300	2,640
South of Leamington/ Warwick/ Whitnash	2,765	4,450	3,900	3,365
East of Leamington	0	200	200	200
East of Kenilworth	1,620	1,620	1,260	770
Westwood Heath (South of Coventry)	880	0	0	350
Rural Area	0	0	200	400
<b>Total</b>	<b>8,605</b>	<b>8,440</b>	<b>8,563</b>	<b>8,429</b>

- 4.20 All options included the same allocation of Brownfield development within the urban areas of Warwick and Leamington Spa. All included development adjacent to the urban areas of Warwick, Leamington and Whitnash and East of Kenilworth however the level differed between options. Option 1 and 4 include different levels of development to the South of Coventry at Westwood Heath, and Options 3 and 4 include development in the rural area. The development allocated to rural areas in Options 3 and 4 focused on what was considered to be the most sustainable villages; Lapworth, Radford Semele, Bishops Tachbrook and Barford.
- 4.21 The transport modelling<sup>78</sup> found that all options of sites could be accommodated however Option 4 was found to be the most favourable in transport terms partly due to it representing a more dispersed pattern of development including villages. This led to consideration of whether the rural areas could accommodate further development. This was reinforced by the wider interpretation of sustainability in the NPPF which allows for development in one location to support services in neighbouring villages.
- 4.22 The four options were appraised against the SA Framework with the findings presented in the Initial SA Report (May 2012) which accompanied the Local Plan Preferred Options Document on public consultation from 01<sup>st</sup> June to 03<sup>rd</sup> August 2012. The findings of the SA for the 4 options are presented in the table below:

**Table 4.3: Summary of SA Findings of Options for the Broad Location of Growth (May 2012)**

Options for the Distribution of Housing Sites	Summary of SA Findings presented in the Initial SA Report (May 2012)
Option 1	Positive effect in terms of supporting the economy. Potential negative effects in terms of reducing the need to travel and using sustainable forms of transport from Blackdown and Westwood Heath. Less critical mass to the south to support sustainable transport options.

<sup>78</sup> Warwick District Council (March 2012) Strategic Transport Assessment Modelling - PARAMICS Testing & Results Report.

Options for the Distribution of Housing Sites	Summary of SA Findings presented in the Initial SA Report (May 2012)
Option 2	Positive effect in terms of supporting the economy. Most compact option of sites likely to have the least negative effects, positive in terms of reducing the need to travel, meeting the districts housing needs, and potential to have the least impact on the historic environment.
Option 3	Positive effect in terms of supporting the economy. Potential negative effects in terms of reducing the need to travel and using sustainable forms of transport from the southern end of The Asps and land at Blackdown. Negative effect on areas of high landscape character and biodiversity importance at The Asps and Blackdown. Potential impact on historic environment as includes large concentration of development adjacent to the Warwick Castle Park.
Option 4	Positive effect in terms of supporting the economy. Potential negative effects in terms of reducing the need to travel and using sustainable forms of transport from land at Blackdown and Westwood Heath. Positive in terms of meeting all housing needs across the district

- 4.22 The findings of the SA along with representations received on the Issues and Scenarios Document and other evidence - including the transport modelling, SHMA, SHLAA, and Joint Green Belt Study (2009) - helped the Council to develop a further option for the distribution of housing sites. This was the Preferred Option and was set out in the Preferred Options Document (May 2012) and is presented in the table below, alongside the other 4 Options, as Option 5.

**Table 4.4: Options for the distribution of housing sites, including the Preferred Option.**

Location	Option				
	1	2	3	4	5
Existing Urban Area <sup>79</sup>	700	700	700	700	480
North of Leamington/ Warwick	2,640	1,470	2,300	2,640	2,640
South of Leamington/ Warwick/ Whitnash	2,765	4,450	3,900	3,365	3,410
East of Leamington	0	200	200	200	200
East of Kenilworth	1,620	1,620	1,260	770	770
Westwood Heath (South of Coventry)	880	0	0	350	0
Rural Area	0	0	200	400	830
<b>Total</b>	<b>8,605</b>	<b>8,440</b>	<b>8,563</b>	<b>8,429</b>	<b>8,360</b>

<sup>79</sup> These figures are not directly comparable because the higher figure contains small urban SHLAA sites and the lower figure does not.



- 4.23 The findings of the SA for Option 5 were presented the Initial SA Report (May 2012) that accompanied the Preferred Options on public consultation from 01 June to 03 August 2012 and is provided in the table below:

**Table 4.5: Summary of SA Findings of the Preferred Option for the Broad Location of Growth (May 2012)**

Preferred Option for the Distribution of Housing Sites	Summary of SA Findings presented in the Initial SA Report (May 2012)
Preferred Option	Positive effect in terms of supporting the economy. Potential negative impact on the historic environment, landscape character and biodiversity at the Asps and land at Blackdown. Positive in terms of meeting all housing needs across the district and in particular a range of rural housing needs.

### ***Options for Potential Site Allocations***

- 4.24 The Strategic Housing Land Availability Assessment (SHLAA) is a key component of the evidence base that supports the Council's Local Plan and its approach to the delivery of new Housing in the District. Sites assessed through the SHLAA<sup>80</sup> as being available, achievable and suitable were considered in further detail by the Council for their potential inclusion within the Local Plan. Those sites with a potential capacity of 40 dwellings or over were considered strategic.
- 4.25 The Preferred Options Document (May 2012) identified a number of strategic sites for development which met the preferred approach for the distribution of housing sites in the District. These sites and alternative options were considered through the SA with the findings presented in the Initial SA Report that accompanied the Preferred Options on consultation from 01 June to 03 August 2012.

### ***Revised Development Strategy (May 2013)***

- 4.26 Following the publication of the Local Plan Preferred Options and Initial SA Report in June 2012, further changes were made to the level and broad location for growth, as well as the distribution of housing sites. The Revised Development Strategy (June 2013) set out the changes since the Preferred Options (May 2012) and provided a justification for them.

### ***Options for the Level of Growth***

- 4.27 The Revised Development Strategy set out an interim level of growth of 12,300 homes between 2011 and 2029 (an annual average of 683 new homes each year), with an understanding that it may be revised depending on the findings of the Joint SHMA and the resulting co-operation between authorities. This is an increase on the overall level of proposed growth set out in the Preferred Options (May 2012), which was 10,800 homes between 2011 and

<sup>80</sup> Warwick District Council (May 2012) Strategic Housing Land Availability Assessment.



2029 (an annual average of 600 new homes each year). The reason for the change in the level of growth is updated evidence, in particular the production of the Economic and Demographic Forecasts Study (December 2012).

- 4.28 The two options for the level of growth (the old preferred option of 600 new homes per year and the new option of 683 homes per year) were appraised against the SA Framework with the findings presented in the Interim SA Report (June 2013) which accompanied the Revised Development Strategy on public consultation from 14<sup>th</sup> June to 29<sup>th</sup> July 2013. The summary findings of the SA for the two options are presented in the table below with the detailed appraisal provided in Appendix IV:

**Table 4.6: Summary of SA Findings of Options for the Level of Growth (June 2013)**

Options for the Level of Growth	Summary of SA Findings presented in the Interim SA Report (June 2013)
Option 1 (old Preferred Option): 600 new homes each year	This option could potentially meet the housing needs of the District and have a direct significant long term positive effect on the housing SA Objective as it will still help to meet the majority of the identified need. The delivery of 600 homes per annum will have indirect minor medium to long term positive effects on SA objectives relating to the economy, sustainable transport and improving accessibility to services and facilities. Proposed development has the potential for negative effects a number of SA Objectives including the prudent use of land, the natural environment and the quality of air, water and soil <sup>81</sup> ; however, there is also uncertainty as the nature of the effect and level of significance will depend on the location of proposed development. The effect of this option on a number of SA Objectives is uncertain as this will be dependent on the location of development and implementation of other policies.
Option 2: 700 new homes each year	This option proposes the delivery of 700 new dwellings per year, 100 more dwellings per year than the option 1. As for option 1, this option will have a direct significant long term positive effect on the housing SA Objective. However, this option will have a more significant positive effect than option 1 as it will help to meet the identified housing need of the District <sup>82</sup> . Similarly, this option will have a more significant indirect minor positive effect (medium to long term) on SA objectives relating to the economy, sustainable transport and improving accessibility to services and facilities. Given the higher level of growth, this option compared to option 1 has the potential for a greater negative effect on SA Objectives relating to the prudent use of land, the natural environment and the quality of air, water and soil <sup>83</sup> . However, as for option 1, there is still some uncertainty as the nature of the effect for a number of SA objectives and level of significance will depend on the location of proposed development and implementation of other policies.

<sup>81</sup> Appendix I & III of the Warwick District Council Interim SA Report (May 2013).

<sup>82</sup> Warwick District Council (March 2012) Strategic Housing Market Assessment.

<sup>83</sup> Appendix I & III of the Warwick District Council Interim SA Report (May 2013).

- 4.29 Table 4.7 provides an outline of the reasons for selection/rejection of alternatives for the level of growth where relevant. It should be noted that whilst the SA findings are considered by the Council in its selection of options and form part of the evidence supporting the Local Plan, the SA findings are not the sole basis for a decision; other factors, including planning and feasibility, play a key role in the decision-making process.

**Table 4.7: Summary of Approach to Alternatives Assessment and Selection for the Level of Growth**

Strategic Options Considered and Appraised	Reasons for Progressing or Rejecting the Option in Plan Making
<b>Options for the Level of Growth</b>	
<b>Option 1:</b> 600 new homes a year <b>Option 2:</b> 700 new homes a year	Option 1 was rejected as the updated evidence showed it would not meet the needs of the District during the life of the Plan. Option 2 was progressed as it would meet the needs of the District during the life of the Plan.

### ***Options for the Location of Growth***

- 4.30 Following the publication of the Local Plan Preferred Options in June 2012, the Council considered if there were potentially any other reasonable alternatives for the location of growth. This was partly due to the consultation responses received on the Preferred Options but also as a result of new information on the ability of non-Green Belt sites to the south of Warwick, Leamington and Whitnash to absorb new development.
- 4.31 In addition, the analysis of representations received following the June/ July 2012 consultation showed that there was considerable opposition to development in the Green Belt to the north of Warwick and Leamington, particularly if there were alternative non-Green Belt locations to the south of the towns. Further, there was a general desire for more development to take place on Brownfield land.
- 4.32 In the light of representations received and new evidence, the Council re-examined the capacity of non-Green Belt land, to the south of Warwick/ Leamington/ Whitnash, and Brownfield land to accommodate new development. The revised approach to the location of growth was set out in the Revised Development Strategy as follows:
- concentrate growth within, and on the edge of, the existing urban areas
  - protect the Green Belt from development where alternative non-Green Belt sites are suitable and available
  - avoid development in locations which could potentially lead to the coalescence of settlements
  - distribute growth across the District, including within and/or on the edge of some villages
  - allow for a hierarchy of growth in the rural area to include:
    - a higher level of growth in larger, more sustainable villages with a reasonable level of services

- o limited growth in smaller villages and hamlets, of a scale appropriate to the existing settlement

4.33 The five options for the location of growth were appraised against the SA Framework with the findings presented in the Interim SA Report (June 2013) which accompanied the Revised Development Strategy on public consultation from 14<sup>th</sup> June to 29<sup>th</sup> July 2013. The summary findings of the SA for the options are presented in the table below with the detailed appraisal provided in Appendix IV:

**Table 4.8: Summary of SA Findings of Options for the Location of Growth (June 2013)**

Options for the Location of Growth	Summary of SA Findings presented in the Interim SA Report (June 2013)
<b>Option 1:</b> Focus development outside the Green Belt	This option would focus development in the south of the District and not offer any scope to meet the needs of Kenilworth or the rural villages in the north. Positive effects for residents in the south of the District through the provision of housing, employment, services/ facilities and improvements to public transport. Potential for concentrated development in the south to increase the level of traffic through the urban areas and this could also potentially increase levels of traffic and therefore levels of atmospheric pollution within the AQMAs. Focussing development outside the Green Belt, in the south of the District has the potential for a significant medium to long term negative effect on the landscape and historic environment given the sensitivity and constraints of that area.
<b>Option 2:</b> Distribute around the urban fringe and across the District (including within and/or on the edge of some villages).	This option has the potential for a significant medium to long term positive effect on SA Objectives relating to housing, employment and access to service/ facilities as it will help to meet the needs of residents across the District. Improved access to housing, employment and health services and facilities has the potential for a long term indirect positive effect on health & well being. Distributing development around the urban fringe as well as the wider District has the potential to support improved public transport services with medium to long term positive effects as well as have significant medium to long term positive effects through reducing the need to travel for residents. A reduction in traffic could have an indirect long term positive effect on SA Objective 10 (climate change mitigation) by helping to reduce greenhouse gas emissions. This option will lead to the loss of Green Belt Land with long term significant negative effects on the prudent use of land and natural resources.
<b>Option 3:</b> Disperse development in small/medium sites, including around the villages	This option proposes the development of small/medium sites, which would help to avoid some of the negative effects associated with the other options through the development of large scale sites. This option is likely to have medium to long term positive effects on SA Objectives relating to the economy, housing, accessibility to services and facilities and health. However, such a pattern of development is unlikely to deliver the same level of associated benefits in terms of improved employment opportunities, public transport and access to services and facilities that larger scale developments can

Options for the Location of Growth	Summary of SA Findings presented in the Interim SA Report (June 2013)
	<p>provide. Smaller sites would make it difficult to provide dedicated services and facilities, which could potentially have negative effects on existing services and facilities. As for option 2, this option will lead to the loss of Green Belt Land with long term significant negative effects on the prudent use of land and natural resources.</p>
<p><b>Option 4:</b> New settlement outside the Green Belt</p>	<p>This option would have similar effects to option 1 in terms of focussing associated benefits and opportunities with a single new settlement that option 1 would not deliver. The scale of a new settlement can provide opportunities for encouraging inward investment and new jobs - in the longer term. Provision of services and associated employment in a new settlement reduces the potential for positive effects on existing businesses and will have negative effects for inward investment (and associated indirect positive on other SA objectives such as health) for existing urban areas; such effects from competing investment will have cumulative negative effects on these areas in the longer term.</p> <p>Similar to option 1, a new settlement in the south of the District would not meet the needs of existing communities, particularly in the north. The scale of a new settlement can provide opportunities for reducing the use of high carbon modes of transport and optimising cycling, walking and public transport. However, there would be limited opportunities for improving and maintaining existing public transport infrastructure. Services, leisure and amenities are likely to be provided as part of such a major development - reducing the need to travel. However, this will not help to reduce the need to travel for residents elsewhere in the District.</p> <p>Focussing development outside the Green Belt, in the south of the District has the potential for a significant medium to long term negative effect on the landscape and historic environment. It should be noted that there is some uncertainty as the precise location for a new settlement is not known.</p>
<p><b>Option 5:</b> Protect the Green Belt from development, where non-Green Belt sites are suitable and available) and concentrate growth within and on the edge of existing urban areas as well as distribute growth across the District.</p>	<p>This option is similar to option 2, seeking to distribute housing around the urban fringe as well as across the wider District, which includes villages. The key difference between the two is that this option seeks to protect the Green Belt from development where alternative non-Green Belt sites are suitable and available. This essentially means that this Option will focus more housing in the South rather than the north of the District, if there are suitable alternative sites available. Similar to Option 2, this option has the potential for a significant medium to long term positive effect on the SA Objective relating to housing as it will help to meet the housing needs of residents across the District and improve accessibility to employment. There will also be improved accessibility to services and facilities for the majority of residents with a medium to long term positive effect on SA Objective 13 as well as indirect long term positive effects on the economy. Improved access to housing, employment and health services and facilities has the</p>

Options for the Location of Growth	Summary of SA Findings presented in the Interim SA Report (June 2013)
	<p>potential for a long term indirect positive effect on health &amp; well being. There is some uncertainty against health as there is the potential for a negative effect in the short time during construction of development for residents on the urban fringe.</p> <p>Distributing development around the urban fringe as well as the wider District has the potential to support improved public transport services with medium to long term positive effects as well as have significant medium to long term positive effects through reducing the need to travel for residents. A reduction in traffic could have an indirect long term positive effect on SA Objective 10 (climate change mitigation) by helping to reduce greenhouse gas emissions. Potential for concentrated development in the south to increase the level of traffic through the urban areas with a medium to long term negative effect on SA Objective 2 (Sustainable transport). This could also potentially increase levels of traffic and therefore levels of atmospheric pollution within the AQMAs<sup>84</sup>. Congestion is one of the main contributors towards areas of poor air quality within the District with road transport responsible for over 40% of CO2 emissions<sup>85</sup>.</p> <p>Similar to option 1, this option will focus development outside the Green Belt with medium to long term negative effect on the landscape and historic environment given the sensitivity and constraints of that area.</p>

- 4.34 Table 4.9 provides an outline of the reasons for selection/rejection of alternatives for the location of growth where relevant.

**Table 4.9: Summary of Approach to Alternatives Assessment and Selection for the Broad Location of Growth**

Strategic Options Considered and Appraised	Reasons for Progressing or Rejecting the Option in Plan Making
<b>Options for the Broad Location of Growth</b>	
<p><b>Option 1:</b> Focus development outside the Green Belt</p> <p><b>Option 2:</b> Distribute around the urban fringe and across the District (including within and/or on the edge of some villages).</p> <p><b>Option 3:</b> Disperse development in small/medium sites, including around the villages</p> <p><b>Option 4:</b> New settlement outside the Green Belt</p> <p><b>Option 5:</b> Protect the Green Belt</p>	<p>Option 1 was rejected as it would lead to the concentration of development within one part of the District and offer no scope for meeting the needs of Kenilworth or villages within the Green Belt. Option 4 was rejected for similar reasons; development would be focussed in one area and offers no scope for meeting the needs of the rest of the District.</p> <p>The Council acknowledged that Option 3 would meet some concerns expressed by the public about the impact of large development</p>

<sup>84</sup> Warwick District Council Website - Air Pollution: <http://www.warwickdc.gov.uk/NR/EXERES/C459BD22-E192-468D-9338-E1ADCFA0C437.htm>

<sup>85</sup> Warwickshire County Council Draft Local Transport Plan 3

<p>from development, where non-Green Belt sites are suitable and available) and concentrate growth within and on the edge of existing urban areas as well as distribute growth across the District.</p>	<p>sites. However, it was rejected as the pattern for growth would make it difficult to properly plan for, and deliver, the necessary infrastructure and would be impractical in terms of the number of sites which would have to be identified. It would also make it difficult to make the fullest use of public transport, walking and cycling and make provision for a full range of community facilities with easy access to jobs, schools and other services.</p> <p>Option 2 was initially progressed as the Preferred Option in 2012 as there was a limited availability of urban Brownfield land so extensions to the urban area offered the most sustainable location for growth. However, new information has since become available that indicates that there is the potential for non-Green Belt Land south of Warwick, Leamington and Whitnash to absorb more development than was previously thought possible. Representation received on the Preferred Options also showed that there is considerable opposition to development in the Green Belt to the north of Warwick and Leamington, particularly if there were alternative non-Green Belt locations to the south of the towns. For these reasons Option 2 was rejected by the Council as it would lead to a significant amount of development on Green Belt Land.</p> <p>Option 5 was developed by the Council in response to the new evidence referred to above, which indicated that the south of the District could accommodate more development. This option was progressed as it would lead to less development on Green Belt Land, which also responds to representations objecting to development in the Green Belt to the north of Warwick and Leamington.</p>
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### ***Options for the Distribution of Housing***

- 4.35 As a result of changes to the broad location of growth the Council also made changes to the distribution of housing sites. Based on the approach to the broad location of growth, the Revised Development Strategy proposed that a significant amount of new development would be located to the south of Warwick/ Leamington/ Whitnash, outside of the Green Belt. However, in the case of development to meet the needs of Kenilworth, there are no non-Green Belt options and land at Thickthorn was considered to be the least harmful alternative in terms of the purposes of Green Belt land and was considered the most sustainable in terms of its proximity to the Town and its services. An additional Green Belt site at Red House Farm in the Lillington area was also included to provide an opportunity for the wider regeneration of the locality.

The distribution of housing sites set out in the Revised Development Strategy is presented in the table below.

**Table 4.10: Revised Development Strategy - broad location of allocated development sites.**

	<b>Total Dwellings</b>	<b>% Total</b>
Urban Brownfield Sites	380	5.7
Sites on the edge of Warwick, Leamington & Whitnash	4,550	68.6
Sites on the edge of Kenilworth	700	10.6
Village Development	1,000	15.1
<b>TOTAL</b>	<b>6,630</b>	<b>100.0</b>

- 4.36 The two options for the level of growth (700 new homes per year and 600 new homes per year) were appraised against the SA Framework with the findings presented in the Interim SA Report (June 2013) which accompanied the Revised Development Strategy on public consultation from 14<sup>th</sup> June to 29<sup>th</sup> July 2013. The summary findings of the SA for the options are presented in the table below with the detailed appraisal provided in Appendix IV:

**Table 4.11: Summary of SA Findings of Options for the Distribution of Housing (June 2013)**

<b>Options for the Distribution of Housing</b>	<b>Summary of SA Findings presented in the Interim SA Report (June 2013)</b>
<b>Option 1</b> Existing Urban Area Brownfield Sites: <b>700</b> North of Lea Spa/ Warwick: <b>2,640</b> South of Lea Spa/Warwick/Whitnash: <b>2,765</b> East of Lea Spa: <b>0</b> East of Kenilworth: <b>1,620</b> Westwood Heath (South of Coventry): <b>880</b> Rural Area: <b>0</b> <b>Total = 8,605</b>	<p>Compared to the other options, this one proposes more development in the north of the District, with 880 dwellings at Westwood Heath (south of Coventry) and 1,620 dwellings east of Kenilworth. The option does not propose any development in the rural area. This option, particularly the development at Westwood Heath, is less likely to meet the needs of the District for housing given the location of proposed development away from the urban areas and category 1 villages. It is more likely to meet the needs of Coventry and will therefore have a slightly reduced positive effect against housing compared to the other options that distribute housing more widely across the District, including rural areas.</p> <p>More development in the north of the District means that this option is likely to have a greater negative effect on SA objective 5 (prudent use of land), given that there will be a greater loss of Green Belt Land, with the potential for significant short to long term negative effects. The reduced quantum of development proposed to the south of Leamington Spa and Warwick would mean that there is less critical mass to support sustainable transport options. However, this option could also put less pressure on an already congested road network in Leamington Spa and Warwick. Even though this option proposes slightly less development in the south, there is still the potential for significant long term effects on heritage and landscape. This option has the potential for a greater negative effect compared to options 3 to 6 on heritage</p>



Options for the Distribution of Housing	Summary of SA Findings presented in the Interim SA Report (June 2013)
	to the east of Kenilworth. Stoneleigh Abbey Historic Park and Garden (Grade II) are adjacent to the eastern boundary of the site and part of a Scheduled Monument (Roman Settlement at Glasshouse Wood) falls within the boundary of the proposed site.
<p><b>Option 2</b> Existing Urban Area Brownfield Sites: <b>700</b> North of Lea Spa/ Warwick: <b>1,470</b> South of Lea Spa/Warwick/Whitnash: <b>4,450</b> East of Lea Spa: <b>200</b> East of Kenilworth: <b>1,620</b> Westwood Heath (South of Coventry): <b>0</b> Rural Area: <b>0</b> <b>Total = 8,440</b></p>	<p>Compared to the other options, this one proposes more development in the south of the District, with over half (4,450 dwellings) of proposed development south of Leamington Spa, Warwick and Whitnash. This means that there would be less development to the north of Leamington Spa and Warwick as well as no development in the rural area. This option will provide more housing and employment to the main urban areas, and would not meet the needs of rural communities. There is the potential for greater negative effect for existing communities in the south in the short term during construction given the concentration of development. However, it is considered that adverse effects could be addressed through appropriate mitigation at the development management level.</p> <p>More development in the south of the District means that this option is likely to have less of a negative effect on SA objective 5 (prudent use of land), as there will be less loss of Green Belt Land. The concentrated level of development proposed to the south of Leamington Spa, Warwick and Whitnash would mean that there is better potential to support sustainable transport options. However, it is less likely to deliver sustainable transport options in the north or improve existing services in rural areas. This option could also put increased pressure on an already congested road network in Leamington Spa and Warwick.</p> <p>Compared to the other options this one has the potential for the greatest negative effect on heritage in the south of the District, which includes Warwick Castle (Grade I), and its Historic Park and Garden (Grade I). It also has the potential for a greater negative effect compared to options 3 to 6 on heritage to the east of Kenilworth. Stoneleigh Abbey Historic Park and Garden (Grade II) is adjacent to the eastern boundary of the site and part of a Scheduled Monument (Roman Settlement at Glasshouse Wood) falls within the boundary of the proposed site. The concentration of development in the south of the District also has the potential for significant long term negative effects on landscape. However, the cumulative effect of proposed development in the south of the District on landscape, along with recommendations to address adverse effects, were considered in the Options for Future Urban Expansion in Warwick District - Considerations for Sustainable Landscape Planning (Nov 2012).</p>
<b>Option 3</b>	This option provides more a balance than option 2 in



Options for the Distribution of Housing	Summary of SA Findings presented in the Interim SA Report (June 2013)
<p>Existing Urban Area Brownfield Sites: <b>700</b> North of Lea Spa/ Warwick: <b>2,300</b> South of Lea Spa/Warwick/Whitnash: <b>3,900</b> East of Lea Spa: <b>200</b> East of Kenilworth: <b>1,260</b> Westwood Heath (South of Coventry): <b>0</b> Rural Area: <b>200</b> <b>Total = 8,563</b></p>	<p>terms of the level of development proposed between the north and south of Leamington Spa and Warwick. This option proposes slightly less development east of Kenilworth and a small number of dwellings in the rural area compared to options 1 and 2. This option will have similar effects to the ones identified for option 2, except that it will have a greater positive effect against housing as it would assist in meeting the housing needs in the rural area. Development in the north will predominantly be on Green Belt Land, therefore there is the potential for a significant long term negative effect on the prudent use of land.</p> <p>Similarly to Option 2, concentrating development in the south of the District means that this option is likely to have less of a negative effect on SA objective 5 (prudent use of land), as there will be less loss of Green Belt Land. The concentrated level of development proposed to the south of Leamington Spa, Warwick and Whitnash would mean that there is better potential to support sustainable transport options. Similar to options 1, 3, 4 &amp; 5 this option could also help to support sustainable transport in the north. This option could also put increased pressure on an already congested road network in Leamington Spa and Warwick.</p> <p>Compared to Option 2, this option will have a slightly reduced but still significant medium to long term negative effect on heritage and landscape in the south of the District. There is the potential for a slightly reduced negative effect compared to options 1 &amp; 2 on heritage to the east of Kenilworth. The cumulative effect of proposed development in the south of the District on landscape, along with recommendations to address adverse effects, were considered in the Options for Future Urban Expansion in Warwick District - Considerations for Sustainable Landscape Planning (Nov 2012).</p>
<p><b>Option 4</b> Existing Urban Area Brownfield Sites: <b>700</b> North of Lea Spa/ Warwick: <b>2,640</b> South of Lea Spa/Warwick/Whitnash: <b>3,365</b> East of Lea Spa: <b>200</b> East of Kenilworth: <b>770</b> Westwood Heath (South of Coventry): <b>350</b> Rural Area: <b>400</b> <b>Total = 8,429</b></p>	<p>This option proposes a reduced amount of development to the east of Kenilworth along with a small amount at Westwood Heath in the north and a slightly increased level of development in the rural area compared to Option 3. Similar to option 1, this option proposes development at Westwood Heath, albeit a reduced level, which is less likely to meet the needs of the District as it is located away from the urban areas and category 1 villages. However, unlike option 1, this option proposes housing development in rural areas, which will help to meet the housing needs of rural communities. This option will have a less significant effect on heritage to the east of Kenilworth, given the reduced level of proposed development.</p> <p>The level of development proposed in the north has the</p>

Options for the Distribution of Housing	Summary of SA Findings presented in the Interim SA Report (June 2013)
	<p>potential for significant long term negative effects on the prudent use of land through the loss of Green Belt Land. The quantum of development proposed in the south has the potential for significant medium to long term negative effects on the landscape and historic environment. Similar to the other options there is also the potential for short to long term negative effects on transport, waste, the natural environment, climate change mitigation and air, water &amp; soil quality.</p>
<p><b>Option 5</b> Existing Urban Area Brownfield Sites: <b>480</b> North of Lea Spa/ Warwick: <b>2,640</b> South of Lea Spa/Warwick/Whitnash: <b>3,410</b> East of Lea Spa: <b>200</b> East of Kenilworth: <b>770</b> Westwood Heath (South of Coventry): <b>0</b> Rural Area: <b>830</b> <b>Total = 8,360</b></p>	<p>This option proposes a greater amount of development in the rural area. Compared to options 1 to 4, this option will have a greater positive effect on meeting the housing needs of rural communities.</p> <p>This option proposes a similar amount of development to the north and south of Warwick, Leamington Spa and Whitnash and east of Kenilworth as Option 4. The potential for significant long term negative effects on heritage to the east of Kenilworth are therefore slightly reduced compared to Options 1, 2 and 3 as less development is proposed. The level of development proposed in the north has the potential for significant long term negative effects on the prudent use of land through the loss of Green Belt Land. The quantum of development proposed in the south has the potential for significant medium to long term negative effects on the landscape and historic environment. Similar to the other options there is also the potential for short to long term negative effects on transport, waste, the natural environment, climate change mitigation and air, water &amp; soil quality.</p>
<p><b>Option 6</b> Existing Urban Area Brownfield Sites: <b>380</b> Consolidation of existing employment sites: <b>450</b> Sites on edge of Warwick / Leamington and Whitnash: <b>4,550</b> Kenilworth: <b>700</b> Village development: <b>1,000</b> <b>Total = 7,080</b></p>	<p>Compared to the other options, this option proposes an increased level of development in the rural area as well as the consolidation of existing employment sites. Similar to options 2 to 5, there is a focus of development in the south of the District on non-Green Belt Land. This option will have a greater positive effect on rural communities compared to the other options, through the provision of 1,000 dwellings to the villages. This will provide better access to homes with indirect positive effects on health and social exclusion. The delivery of homes in the villages should be balanced with the provision of employment opportunities in order to help reduce the need to travel. This option will also lead to less development north of Warwick and Leamington Spa which means that there will be less loss of Green Belt Land and therefore less of a significant effect on the prudent use of land compared to the other options.</p> <p>The concentrated level of development proposed to the south of Leamington Spa, Warwick and Whitnash would mean that there is better potential to support sustainable transport options. However, it is less likely to deliver sustainable transport options in the north or improve</p>

Options for the Distribution of Housing	Summary of SA Findings presented in the Interim SA Report (June 2013)
	<p>existing services. The potential for significant long term negative effects on heritage to the east of Kenilworth are also slightly reduced compared to options 1, 2 and 3 as less development is proposed. As for options 2 to 5, the quantum of development proposed in the south has the potential for significant medium to long term negative effects on the landscape and historic environment. The cumulative effect of proposed development in the south of the District on landscape, along with recommendations to address adverse effects, were considered in the Options for Future Urban Expansion in Warwick District - Considerations for Sustainable Landscape Planning (Nov 2012). Similar to the other options there is also the potential for short to long term negative effects on transport, waste, the natural environment, climate change mitigation and air, water &amp; soil quality.</p>

- 4.35 Table 4.12 provides an outline of the reasons for selection/rejection of alternatives for the distribution of housing where relevant.

**Table 4.12: Summary of Approach to Alternatives Assessment and Selection for the Distribution of Housing Sites**

Strategic Options Considered and Appraised	Reasons for Progressing or Rejecting the Option in Plan Making
<b>Options for the Distribution of Housing Sites</b>	
<p><b>Option 1:</b> As above in Table 4.11  <b>Option 2:</b> As above in Table 4.11  <b>Option 3:</b> As above in Table 4.11  <b>Option 4:</b> As above in Table 4.11  <b>Option 5:</b> As above in Table 4.11  <b>Option 6:</b> As above in Table 4.11</p>	<p>The transport modelling found that options 1 to 4 could be accommodated; however option 4 was found to be the most favourable in transport terms partly due to it representing a more dispersed pattern of development including villages. This led the Council to consider whether the rural areas could accommodate further development. Option 5 was progressed as the Preferred Option in 2012, as it conformed to the then Preferred Option for the broad location of growth and would help to meet the needs of the whole District. Options 1 to 4 were rejected as they would not provide the same scope for meeting the needs of the wider District.</p> <p>As a result of new evidence and representations received on the Preferred Options the approach to the broad locations of growth was revised, with more of a focus on non-Green Belt Land to the south of Warwick, Leamington and Whitnash. Option 5 no longer conformed to the preferred approach for the location of development so was therefore rejected by the Council. Option 6 was developed and conformed to the new</p>

	approach to the location of growth, with a focus for development in the south, while also meeting the needs of the wider District. Option 6 was therefore progressed.
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### ***Options for Potential Site Allocations***

- 4.36 Following the publication of the Local Plan Preferred Options and Initial SA Report in June 2012, there were changes to the broad location for growth and distribution of housing sites. This meant that there were a number of changes to the potential sites allocated in the Local Plan. The Revised Development Strategy (June 2013) focussed more development to the south of Warwick, Leamington and Whitnash on suitable and available non-Green Belt Land.
- 4.37 Given the changes to the Local Plan since the Preferred Options and new evidence with regard to the cumulative impacts on landscape and traffic infrastructure in the south, it was considered necessary to revise and update the SA of potential site allocation options presented in the Initial SA Report (May 2012). The detailed individual appraisals were presented in Appendix III of the Interim SA Report (June 2013) with a summary of the findings provided in Section 4. The reasons for the selection and rejection of the site allocation options through plan-making were provided in Section 4 of the Interim SA Report (June 2013), they have also been provided later in this Section in Table 4.13. The chronology of identifying, assessing and refining options for site allocations is detailed in Appendix VII of this Report.

### **Publication Draft Local Plan (April 2014)**

- 4.38 Following the publication of the Revised Development Strategy and Interim SA Report in June 2013, further changes were made to the overall level of growth, distribution of housing, and strategic site allocations as a result of consultation responses and updated evidence.

### ***Options for the Level of Growth***

- 4.39 The Planning Inspector who considered the Coventry City Council's Core Strategy recommended that the City carry out a Joint Strategic Housing Market Assessment (Joint SHMA) with its neighbouring authorities, specifically Warwick District, Rugby Borough and Nuneaton and Bedworth Borough. This would help to ensure that housing growth in the sub-region is considered strategically and that all needs are met. A Joint SHMA was carried out with the findings published in November 2013.
- 4.40 The Joint SHMA assessed that the overall need for Warwick District up to 2031 is 720 dwellings per annum, which is slightly higher than the preferred option of 700 dwellings set out within the Revised Development Strategy (June 2013). Taking the findings of the Joint SHMA into account the Council is progressing with 720 dwellings per year as the preferred level of growth in the Publication Draft Local Plan as this meets the objectively assessed need of the District.

The previous preferred option of 700 dwellings has been adjusted to reflect updated evidence, in particular the Joint SHMA.

- 4.41 The slightly higher level of growth at 720 dwellings per year is considered unlikely to result in any significant difference in the nature and significance of effects identified in the appraisal for the previous preferred option at 700 dwellings per year. The sustainability appraisal was presented in Appendix II of the Interim SA report (June 2013) and is presented in Appendix IV of this SA Report. There is the potential for a slightly enhanced positive effect against the housing SA Objective as it will meet the objectively assessed need of the District. There is also the potential for a slightly enhanced positive effect against SA Objectives relating to the economy, sustainable transport and improving accessibility to services and facilities through the provision of more housing.
- 4.42 Conversely, there is the potential for a slightly higher level of growth to have a greater negative effect on SA Objectives relating to the prudent use of land, the natural environment and the quality of air, water and soil. However, there is still some uncertainty as the nature and significance of the effect is dependent on the location of proposed development and sensitivity of receptors. It is therefore considered unlikely that there would be a significant difference in the nature and significance of the effects between the new and previous preferred option for the overall level of growth. The reasons for the selection and rejection of options presented in Table 4.7 are therefore still valid.

#### ***Options for the Location of Growth***

- 4.43 The overall spatial strategy for the distribution of growth has not changed since the Revised Development Strategy was published in June 2013. The Publication Draft Local Plan still seeks to protect the Green Belt by focussing development on non-Green Belt sites where suitable and available and by concentrating growth within and on the edge of existing urban areas as well as distributing it across the District. The reasons for the selection and rejection of options presented in Table 4.9 are therefore still valid.

#### ***Options for the Distribution of Housing***

- 4.44 As a result of changes to the overall level of growth there have been some changes to the preferred option for the distribution of housing sites. The table below sets out how the housing requirement is being met in the emerging Publication Draft Local Plan and compares it to that proposed in the Revised Development Strategy (2013).

**Table 4.13: Meeting the Housing requirement**

	<b>Revised Development Strategy 2013</b>	<b>Publication Draft Local Plan 2014</b>
Sites completed between 2011 and 2013	447	406
Sites with outstanding planning permission at 1st April 2013	1,681	1,906

Sites with planning permission granted between 1st April 2013 and 31st December 2013		1,317
Small Urban SHLAA sites assessed as being suitable	300	393
An allowance for windfall sites coming forward in the plan period	2,800	2,485
Consolidation of existing employment areas and canal-side regeneration	450	269
Sites allocated in this Plan	6,622	6,248
<b>Total</b>	<b>12,300</b>	<b>13,024</b>

- 4.45 The table below compares the broad location of allocated sites for housing proposed in the Revised Development Strategy and Publication Draft Local Plan.

**Table 4.14: Broad Location for Allocated Sites**

	<b>Revised Development Strategy 2013</b>	<b>Publication Draft Local Plan 2014</b>
Existing Urban Area Brownfield Sites	380 (5.7%)	1,330 (21.3%)
Greenfield sites on edge of Warwick, Leamington and Whitnash	4,550 (68.6%)	3,295 (52.7%)
Greenfield sites on edge of Kenilworth	700 (10.6%)	850 (13.6%)
Village development	1,000 (15.1%)	773 (12.4%)
<b>Total</b>	<b>6,630</b>	<b>6,248</b>

- 4.46 The table above shows that the distribution of housing still conforms to the preferred spatial strategy by protecting Green Belt land to the north of District and focussing development around Warwick, Leamington and Whitnash. A greater proportion of development is now proposed on urban Brownfield sites and on the edge of Kenilworth while there has been a reduction in the proportion of development on the edge of Warwick, Leamington and Whitnash and in the rural area (including villages).
- 4.47 In terms of alternatives for the broad distribution of housing, the proposed changes as set out above do not significantly affect the findings of the sustainability appraisal for the preferred option as set out in the Revised Development Strategy 2013 (Option 6), which was presented in Appendix II of the Interim SA Report (June 2013). Similar to all the options, the current broad distribution of housing proposed in the Publication Draft Local Plan still has the potential for a significant medium to long term positive effect on the SA objective relating to housing and indirect long term positive effects on the economy, access to local services and facilities and health and well being.



- 4.48 There is still the potential for indirect positive effects on health and social exclusion by providing development in the rural area helping to meet the needs of rural communities. There is still a focus of development in the south of the District on non-Green Belt Land, which provides better potential to support sustainable transport options in the south; however, it is also less likely to deliver them or improve existing services in the north. The preferred distribution of housing now proposes a greater proportion of development on urban brownfield sites, which means there is the potential for a slightly reduced negative effect on the prudent use of land. However, given the level of development proposed on greenfield sites there is still the potential for minor negative effects.
- 4.49 The quantum of development proposed in the south still has the potential for significant medium to long term negative effects on the landscape and historic environment. It is therefore concluded that the changes to the preferred option for the broad location of allocated sites does not significantly change the nature or significance of effects previously identified for Option 6 in Appendix IV of this Report. The reasons for the selection and rejection of options presented in Table 4.12 are therefore still valid.

### ***Options for Potential Site Allocations***

- 4.50 Following the publication of the Revised Development Strategy and Interim SA Report in June 2013, there have been changes to potential options for site allocations. These changes are as a result of updated evidence and the consultation responses received on the Revised Development Strategy. The changes to options - including any new site - and how they have been considered through the SA is set out in Appendix VII of this Report.
- 4.51 Where necessary, previous appraisals presented in Appendix III of the Interim SA Report (June 2013) have been revised to take account of changes and/ or updated evidence. Any new site options being considered through plan-making have also been subject to appraisal. The findings of the SA for potential site allocation options are presented in Appendix V of this SA Report.
- 4.52 Table 4.15 provides an outline of the reasons for selection/rejection of alternatives for site allocations where relevant.

**Table 4.15: Summary of Approach to Alternatives Assessment and Selection for Site Allocations**

<b>Strategic Sites Considered and Appraised</b>	<b>Reasons for Progressing or Rejecting the Site in Plan Making</b>
<b>Site Allocations taken forward in the Publication Draft Local Plan (2014)</b>	
Kenilworth School Site	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable
Former Severn Trent Sewage Works, south of Harbury Lane	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
Station Approach,	Site taken forward as it conforms to the Preferred

Leamington Spa	Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
Former Ridgeway School and Land at Montague Road, Warwick	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
Kenilworth VI Form College	Site is assessed through the SHLAA as being available, achievable and suitable; however, it does not conform to the Preferred Approach to the location of growth as part of the site is within the Green Belt. Site taken forward as it is needed to meet the needs of Kenilworth and is considered to be a less harmful alternative in Green Belt and landscape terms and one of the most sustainable in terms of its proximity to the Town and its services and is in part on previously developed land.
Soans Site	Site assessed as Suitable, Available & Achievable in the SHLAA Review and conforms to preferred approach for location of growth on urban brownfield land
Riverside House, Leamington Spa	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
Court Street	New enlarged site assessed as Suitable, Available & Achievable in the SHLAA Review and conforms to preferred approach for location of growth on urban brownfield land.
Leamington Fire Station, Leamington Spa	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
Garage Site, Theatre Street	New site assessed as Suitable, Available & Achievable in the SHLAA Review and conforms to preferred approach for location of growth on urban brownfield land.
Aylesbury House Hotel	New site assessed as Suitable, Available & Achievable in the SHLAA Review and conforms to preferred approach for location of growth on brownfield land.
Land West of Europa Way (known in Appendix V as Myton Garden Suburb)	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
Land South of Harbury Lane (known in Appendix V as Lower Heathcote Farm and Grove Farm)	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
East of Whitnash/South of Sydenham (known in Appendix V as Land at Champion School/Whitnash East)	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
Red House Farm (East of Lillington)	Site is assessed through the SHLAA as being available, achievable and suitable; however, it does not conform to the Preferred Approach to the location of growth as it is within the Green Belt. Site taken forward as it



	provides an opportunity for the wider regeneration of the locality.
East of Kenilworth (Thickthorn)	Site is assessed through the SHLAA as being available, achievable and suitable; however, it does not conform to the Preferred Approach to the location of growth as it is within the Green Belt. Site taken forward as it is needed to meet the needs of Kenilworth and is considered to be the least harmful alternative in terms of the purposes of Green Belt Land and the most sustainable in terms of its proximity to the Town and its services.
Crackley Triangle	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
Oaklea Farm, Finham	Site was taken forward as it is a sustainable site on the edge of Coventry with limited impact on the green belt.
Campion Hills	Site is assessed through the SHLAA as being available, achievable and suitable; however, it does not conform to the Preferred Approach to the location of growth as it is within the Green Belt. Site taken forward to support the regeneration of Lillington and is considered to be the least harmful alternative in terms of the purposes of Green Belt Land and the most sustainable in terms of its proximity to local services in Lillington.
<b>Site Allocations taken forward as commitments</b>	
Golf Lane/ Fieldgate Lane, Whitnash	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
Warwick Gates Employment Land	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
Land at Woodside Farm, Whitnash	Site taken forward as it conforms to the Preferred Option for the location of growth and is assessed through the SHLAA as being available, achievable and suitable.
<b>Alternative sites rejected</b>	
North of Milverton (West)	Site rejected as updated landscape and transport evidence suggests more development could be delivered to the south of the district on non-Green Belt Land.
North of Milverton (East)	Site rejected as updated landscape and transport evidence suggests more development could be delivered to the south of the district on non-Green Belt Land.
North of Milverton (whole site)	Site rejected as updated landscape and transport evidence suggests more development could be delivered to the south of the district on non-Green Belt Land.
Land at Blackdown	Site rejected as updated landscape and transport evidence suggests more development could be delivered to the south of the district on non-Green Belt Land.

Westwood Heath	Site rejected as updated landscape and transport evidence suggests more development could be delivered to the south of the district on non-Green Belt Land. There is also potential for impacts on infrastructure outside of Warwick District.
Westwood Heath (Partial)	Site rejected as updated landscape and transport evidence suggests more development could be delivered to the south of the district on non-Green Belt Land. There is also potential for impacts on infrastructure outside of Warwick District.
Welsh Road, Cubbington	Site rejected as currently an active employment site and updated landscape and transport evidence suggests more development could be delivered to the south of the district on non-Green Belt Land.
Loes Farm	Site rejected as updated landscape and transport evidence suggests more development could be delivered to the south of the district on non-Green Belt Land. The impacts on landscape would also be difficult to mitigate.
South of Gallows Hill	Heritage Setting Assessment undertaken in line with English Heritage guidance suggests the impact on the Castle and Castle Park is significant and that as a result this site should not be developed.
Land South of Gallows Hill, The Asps and Park Farm	Northern part (South of Gallows Hill) of site retained. The Asps and Park Farm were rejected as a result of potential impacts on the landscape and historic environment.
West of St Marys Lands	Site rejected as access constraints were reassessed, confirming the conclusion of the SHLAA, which was that the Racecourse track is essential to the operation of the racecourse so availability is not likely to be realised.
Leamington Cricket Club	Site rejected as there are concerns about the loss of a viable local sporting facility and loss of open space within the existing built up area,
Warwickshire College, Warwick New Road, Leamington Spa.	Site rejected following representations from the College.
Glasshouse Lane/Crewe Lane	Site rejected as updated landscape and transport evidence suggests more development could be delivered to the south of the district on non-Green Belt Land.
Kenilworth Golf Course	Site rejected as updated landscape and transport evidence suggests more development could be delivered to the south of the district on non-Green Belt Land.
Oaks Farm	Site rejected as not identified as suitable for an urban extension in the SHLAA.

### ***Options for Village Site Allocations***

- 4.53 In November 2013 the Council published a Village Housing Options and Settlement Boundary Document to help inform the Local Plan. The document set out potential options for village site allocations and indicative proposals

for new village boundaries. The potential site options considered by the Council for each settlement were subject to SA against each SA Objective with the method and findings published alongside the Village Housing Options and Settlement Boundary Document for consultation from 25 November 2013 to 10 January 2014. The findings of the SA informed the Council's decision-making and therefore the selection and rejection of options.

- 4.54 Following the consultation and to take account of representations and updates to evidence, there have been a number of changes to potential village site options, including new sites. These changes and how they have been considered through the SA are presented in Appendix VII of this Report. To take account of the changes, revisions have been made to the appraisal that accompanied the Village Housing Options and Settlement Boundary Document on consultation in November 2013. The findings and revised appraisals for potential village site options are presented in Appendix IV of this Report.
- 4.55 Table 4.16 provides an outline of the reasons for selection/rejection of alternatives for village site allocations.

**Table 4.16: Summary of Approach to Alternatives Assessment and Selection for Potential Village Site Allocations**

Potential Sites Considered	Reasons for Progressing or Rejecting the Option in Plan Making
<b>Baginton</b>	
BAG1*O - North of Rosswood Farm	Site progressed – small residential site that will help address local housing need. Landscape assessment has been revisited and supports a limited quantity of development on the site.
BAG2*O - Land at Mill Hill	Rejected option – landfill site with high landscape value scoring near conservation area and scheduled ancient monument.
BAG3*O – Land to the East of Andrews Close	Rejected option – landfill site with potentially high remediation costs. Site is now located within the boundary of the gateway project.
BAG4*O – Land off Friends Close	Rejected option – elevated site which is unsuitable due to quarry / geological importance, potential contamination and landscape impact.
BAG5*O – Russells Garden Centre	Rejected option – number of site constraints including substantial flood risk. Also currently an active commercial use.
<b>Barford</b>	
BAR1*O - Land West of Wellesbourne Road	Rejected option – uncertainty over site deliverability with no active site sponsor. Remediation costs may be high on such a small site. Possible windfall.
BAR2*O - Sherbourne Nursery	Site progressed – medium sized residential site near the heart of the village and local services. Concerns will need to be addressed regarding the quality of the site access, development phasing and type and mix of housing. Proximity of the conservation area is also another important

	development consideration.
BAR3*O - Land Off Bremridge Close	Site progressed – Small development site with a strong relationship to nearby new development. Level of development reduced slightly to reflect close proximity to existing development.
BAR4*O - Land off Wasperton Road Extended	Rejected option – site forms part of a very open field landscape, development of which may encourage the further erosion of this strongly agricultural area on the edge of the village.
BAR5*O - Land North of Telephone Exchange	Rejected option – site has a number of development constraints including insufficient highways access, partial flooding and high traffic noise.
BAR6*O - South of Barford House	Site progressed – small enclosed site with some limited potential for a sensitively designed development.
BAR7*O - Land rear of Granville Public House	Rejected option – site suffers from poor access and higher landscape value scoring than nearby Sherbourne Nursery site.
<b>Bishop's Tachbrook</b>	
BT1*O - South of School	Site progressed – larger scale development site which will assist in delivering significant regenerative benefits and free traffic flow around Kingsley Close and the local school.
BT2*O - Land West of Bishop's Tachbrook	Rejected option – site considered of high landscape value and located some distance from main services / facilities. Western edge of the settlement is more rural in character – open views northwards.
BT3*O - Land at Tachbrook Hill Farm	Rejected option – edge of village site with little or no major connectivity to the main village. Distinctly rural environment which would have a significant impact on landscape character.
<b>Burton Green</b>	
BG1*O - Land SW of Westwood Heath Road	Rejected option – medium sized development site within an area of high landscape value, with difficult site access.
BG2*O - Land off Cromwell Lane, Burton Green	Rejected option – medium sized development site within an area of high landscape value, with difficult site access.
BG3*O - Land off Hodgetts Lane	Rejected option – backland development site with significant impact on nearby residential properties.
BG4*O - Burrow Hill Nursery	Site progressed – provides an option to better connect the village together and space for community and other uses.
BG5*O - Land at the Rear of the Peeping Tom Pub	Rejected option – reasonably enclosed site which reflects the historic landscape character of the area which should be retained.
BG6*O - Red Lane to the south of New Farm	Rejected option – area of high landscape value and would lead to further ribbon development.
BG7*O - Land North of The Small Holding, Red Lane	Rejected option – area of high landscape value and would lead to further ribbon development.
<b>Cubbington</b>	
CU1*O - Allotment land,	Site progressed – development site linked to

Rugby Road	CU2*O and would provide a mixture of housing to meet local housing needs. An alternative nearby new allotment site has been identified. Significant environmental screening will be required.
CU2*O - Land opposite Willow Sheet Meadow	Site progressed – development will mirror the Cotton Mills Spinney area opposite and integrate with CU1*O. Significant environmental screening will be required.
CU3*O - Allotment Gardens, Coventry Road	Rejected option – would lead to a significant finger of new development into an area of high landscape value.
CU4*O - Waverley Equestrian Centre	Rejected option – would lead to a significant finger of new development into an area of high landscape value.
CU6*O – Confidential Site	Rejected option – site flooding and no development interest.
CU7*O - North of Bungalow Farm	Rejected option – elevated site within an area of high landscape value, potential problems with site access.
<b>Hampton Magna</b>	
HM1*O – Land South of Arras Boulevard	Site progressed – large Greenfield site, with potential for strong connectivity with the existing village facilities. Potential regenerative impacts.
HM2*O – Land to the East of Clifton Avenue	Rejected option – Edge of settlement location with little connection to the main village.
HM3*O – Land to the North East of Blandford Way	Rejected option – small site with insufficient vehicular access – potentially high landscape impact.
HM4*O - Land west of Stanks Farm	Rejected option – some sustainability benefits due to proximity to railway station, but the site is disconnected to the main village settlement.
HM5*O – Land South of Lloyd Close	Rejected option – some connectivity to the main settlement but potentially significant impact on nearby residents and little regenerative impact.
HM6*O - Maple Lodge	Rejected option – located within a parcel of high landscape value – disconnected from the main village and its core services / facilities.
<b>Hatton Park</b>	
HP1*O - Land north of Grand Union Canal	Rejected option – site has a high landscape impact, disconnected to the main village and would lead to ribbon development along Hatton Hill.
HP2*O - Land north-west of Severn Trent Treatment Works	Rejected option – potentially significant loss of Local Wildlife Site in an area of high landscape value.
HP3*O – Land North of Birmingham Road	Site progressed – land take reduced in consideration of proximity of Smith's Covert – options to integrate within the village and provide a strong environmental buffer to the site.
HP4*O - 407 Birmingham Road and land to West	Rejected option – impact on potential local wildlife site and wider canal corridor – area of high landscape value.
HP5*O - Land west of R75 Birmingham Road	Rejected option – impact on potential local wildlife site and wider canal corridor – area of high landscape value.

<b>Hatton Station</b>	
HS1*O – Former Storage Depot, Oakdene Crescent	Site withdrawn due to change in policy direction - small infill only policy will apply to smaller/lower scoring settlements.
HS2*O – Land West of Station Road	Site withdrawn due to change in policy direction - small infill only policy will apply to smaller/lower scoring settlements.
HS3*O – Land off Station Road	Site withdrawn due to change in policy direction - small infill only policy will apply to smaller/lower scoring settlements.
<b>Hill Wootton</b>	
HW1*O – Land South of Hill Wootton Road	Site withdrawn due to change in policy direction - small infill only policy will apply to smaller/lower scoring settlements.
<b>Kingswood</b>	
KW1*O - Meadow House, Kingswood	Site progressed – suitable in part on a reduced scale following consideration of new hydrology modelling. Will require sensitive development along the canal edge.
KW2*O - Kingswood Farm	Site progressed – suitable in part subject to sensitive design recognising proximity to a nearby listed building and a canal corridor.
KW3*O - South of Kingswood Close	Rejected option – not suitable due to substantial impact on tree frontage and major impact on landscape character.
KW4*O - Station Lane, opposite Gowen Bank	Rejected option – major impact on an area of high landscape character and a central characteristic of the village.
KW5*O - Land South of the Stables, Station Lane	Site progressed – suitable at a small scale due to limited site access and proximity to an area of high landscape value.
KW6*O - Land South of Rising Lane	Rejected option – insufficient vehicle access and significant impact on landscape character.
KW7*O - Rear of Broom Hall Lane	Site progressed – potential small scale housing site, within a reasonable central location.
KW8*O - East of Lenson	Withdrawn option – development capacity likely to drop below 5 dwellings. Site may come forward as a windfall.
KW9*O - Priory Farm	Rejected option – not suitable due to frequent localised flooding.
KW10*O - Swallowfield Stud	Rejected option – not suitable due to frequent localised flooding.
KW11*O - Land Off Brome Hall Lane	Rejected option – site is outside the main village envelope in an area of high landscape value.
KW12*O - Land to the Rear of Kingswood Cottages	Rejected option – considerable risk of flooding on parts of the site, with new development increasing this risk to properties within very close proximity. Flood alleviation measures may reduce the capacity of the site to less than 5 units.
KW13*O - Land to the west of Mill Lane	Site progressed – brownfield site with potential for small scale re-development.
<b>Leek Wootton</b>	
LW1*O – The Paddock, Police HQ	Site progressed – suitable in part as a low-density development, subject to comprehensive masterplanning and minimising impact on the

	listed building and its surrounding landscape.
LW2*O – Land North of Main Entrance, Police HQ	Site progressed – suitable in part as a reduced scale to take into consideration the sensitivity of the landscape in this area.
LW3*O – Former Tennis Courts, Police HQ	Site progressed – suitable in part as a reduced scale to take into consideration the sensitivity of the landscape in this area.
LW4*O - Informal Car Park, Warwickshire Golf and Country Club	Site progressed – small scale development option near the primary school.
LW5*O - Open Field, Warwickshire Golf and Country Club	Rejected option – reassessed with a high landscape scoring, elevated site to the rear.
LW6*O – Land North of Hill Wootton Road	Rejected option – site provides a natural environmental buffer to the main village and suffers from noise pollution from the nearby A46.
LW7*O - Land South of Hill Wootton Road	Rejected option – site provides a natural environmental buffer to the main village and noise issues are a considerable potential constraint.
LW8*O – Woodcote House	Site withdrawn as an allocated village site – development may come forward on the existing build form footprint.
LW9*O - Warwickshire Police HQ, Northern Lodge	Rejected option – site is separated from the main build form of the village.
LW10*O - Land off Home Farm, Leek Wootton	Rejected option – site access is insufficient to support a large scale development. Site is located within an area of high landscape value.
LW11*O - Rear of the Hamlet	Rejected option – not suitable due to site access and close proximity to Site of Interest for Nature Conservation and Ancient Woodland
LW12*O - Land off Warwick Road	Rejected option – not suitable due to landscape impact an undesirable northern extension of the village and perceived coalescence impact with Kenilworth.
LW13*O - Black Spinney Fields	Rejected option – not suitable due to site access and close proximity to Site of Interest for Nature Conservation and Ancient Woodland.
<b>Radford Semele</b>	
Site(s): RS1*O – Land South of Southam Road	Rejected option – site is located within an area of high landscape value. Limited options to contain development.
Site(s): RS1*O – Land South of Southam Road (Expanded)	Rejected option – site is located within an area of high landscape value. Limited options to contain development.
RS2*O – Land North of Southam Road	Site progressed – originally rejected on insufficient highways access, which has now been resolved. Site will require substantial environmental screening, but development will need to minimise ribbon development along the A425.
RS3*O – South West Radford Semele	Rejected option – local concerns about the coalescence of settlements at this sensitive south western corner of the village, also likely to add significantly to congestion within the village along School Lane.

RS4*O - Land to the East of Church Lane	Rejected option – site revaluated as high landscape value, development of which would lead to a loss of valued land providing a rural setting to the village and church.
<b>Shrewley Common</b>	
SC01*O – Land at the Gatehouse	Site withdrawn due to change in policy direction - small infill only policy will apply to smaller/lower scoring settlements.
SC02*O Land South East of Shrewley Common	Site withdrawn due to change in policy direction - small infill only policy will apply to smaller/lower scoring settlements.
<b>Hockley Heath</b>	
HOC1*O – Former Aylesbury House Hotel and Surrounds	This site is no longer being considered as a potential village site allocation. The reasons for selection/rejection are provided in Table 4.16 above.
<b>Coventry Finham settlement</b>	
COP1*O – Land at Oak Lea, Howes Lane	This site is no longer being considered as a potential village site allocation. The reasons for selection/rejection are provided in Table 4.16 above.



## **5.0 SA of the Publication Draft Local Plan**

### **5.1 Introduction**

- 5.1 This Section sets out the findings of the SA of the Publication Draft Local Plan. It is structured according to 10 key topics which have been linked to relevant SA Objectives as well as SEA Directive topics and relevant paragraphs from the NPPF. The appraisal of each topic has been divided into a number of sub-headings to ensure that each aspect of the emerging Local Plan is considered, including policies and site allocations, as well as the interrelationships between topics and cumulative effects of the Plan as a whole.
- 5.2 In accordance with the SEA Directive and Regulations any likely significant effects are identified along with any mitigation measures necessary to address them. The SA does not therefore provide a narrative on the nature and significance of effects for each policy within the Local Plan, as a policy might not be relevant to a particular topic or is considered unlikely to have a significant effect.

### **The Vision and Objectives**

- 5.3 A compatibility analysis of the Objectives of the Local Plan was carried out against the SA Framework and presented in the SA Scoping Report published in 2011. The compatibility analysis found that the majority of Local Plan objectives were either compatible or neutral against SA Objectives, with some uncertainty also identified.
- 5.4 Since the Scoping Report (2011) there have been changes to the vision and objectives of the Local Plan to bring them in line with the Warwickshire Sustainable Community Strategy and Warwick District Council's Corporate Development Strategy. The current vision and objectives for the Publication Draft Local Plan are set out in Section 1 of this SA Report.
- 5.5 The vision is considered to be compatible with the majority of SA Objectives as it seeks to make Warwick District a great place to live, work and visit. The objectives are considered to be compatible with SA Objectives relating to housing, the economy, communities and health as they support housing and employment growth, which will have positive effects for those topics. They also seek to ensure well-designed new development that is in the right location to address climate change, which is compatible with SA Objective 11. There is the potential for conflict between Local Plan objectives that support growth and SA objectives relating to the natural environment and heritage.

## SA of the Publication Draft Local Plan

### Housing

SEA Directive Topics: Population & Human Health  
NPPF paras 47 - 68

Relevant SA Objectives:

- SA Objective 7: To create and maintain safe, well-designed, high quality built environments
- SA Objective 12: To meet the housing needs of the whole community (ensuring the provision of decent and affordable housing for all, of the right quantity, type, size and tenure)

### Appraisal of Publication Draft Local Plan Policies

- 5.6 Strategic Policy DS2 (Providing the Homes the District Needs) seeks the provision of the full Objectively Assessed Need for housing in the District and ensures new housing delivers the quality and mix of homes needed, affordable homes, and sites for gypsies and travellers. This has the potential for a major short to long-term positive effect against this topic, and in particular SA Objective 12. Policies DS7 (housing requirement), DS10 (broad location of housing), DS11 (site allocations) and H1 (Directing New Housing) are also likely to have major short to long-term positive effects on housing as they set out the requirement for 12,860 new homes between 2011 and 2029 and where it will be delivered. The spatial strategy (Policy DS4) seeks to distribute housing across the District and meet the needs of both urban and rural areas.
- 5.7 Policy H2 (Affordable Housing) requires that residential developments in the urban area (for sites of 10 or more dwellings or 0.25 hectares or more in area) and the rural area (for sites of 5 or more dwellings) make provision for a minimum of 40% affordable housing. The Joint SHMA identified a need for 268 new affordable homes per annum over the life of the plan and this is equivalent to 37% of the total requirement. There is the potential for major long-term positive effect on housing by meeting the identified need for affordable homes during the life of the Plan. There is also the potential for minor positive effects on housing as a result of Policy H3 (Affordable Housing on Rural Exception Sites) which seeks affordable housing on rural exception sites.
- 5.8 The overarching policy for housing and Policy H4 (Securing a Mix of Housing) seek to ensure that the District has the right amount, quality and mix of housing to meet future needs, which has the potential for a major positive effect on this topic. Policies H4 to H8 have the potential for a minor long-term positive effect on meeting the housing need for the whole community as they relate to the provision of multiple/student accommodation, housing for older people, provision of gypsies and traveller sites and provision of housing for rural workers. There is also the potential for long-term positive effects through

Policy HS5, which supports proposals that provide homes to meet the needs of older people and those with disabilities.

- 5.9 Policy DS5 (Presumption in Favour of Sustainable Development) sets out the Council's positive approach to considering development proposals in line with the NPPF, proactively working with applicants to find solutions which mean that proposals can be approved wherever possible. This has the potential for a minor long-term positive effect on housing. Taking account of the duty to cooperate within the NPPF, Policy DS20 requires a review of the Local Plan if evidence demonstrates that significant housing needs arising from outside the District's boundaries should be met within Warwick District. This has the potential for minor long-term positive effects on housing outside the Plan area; however, at this stage this is uncertain.
- 5.10 The overarching policy on sustainable communities seeks all new development to deliver high quality layout and design with the potential for a positive effect on SA Objective 7. Policy BE1 (Layout and Design) permits new development where it positively contributes to the character and quality of its environment through good layout and design. These policies will ensure that new development is well-designed and good quality and will minimise potential impacts on the existing built environment. The layout and design of new development is also encouraged to minimise the potential for crime and anti-social behaviour through Policy HS17 (Crime Prevention), which has the potential for long-term positive effects. Specific measures for the design and layout of strategic housing sites of over 200 dwellings will be set out in development briefs (Policy BE2).

### ***Appraisal of Site Allocations***

- 5.11 The site allocations and village site allocations were appraised as all having the potential for a positive effect on this topic of housing through the provision of residential development. Those allocations of 100 or more dwellings were considered to have the potential for significant long-term positive effects on SA Objective 12. The detailed appraisal of site allocations is provided in Appendix V and VI of this SA Report.

### ***Synergistic and Cumulative Effects***

- 5.12 Overall, the Local Plan will have major short to long-term positive cumulative effects on housing through the provision of 12,860 new homes to meet the objectively assessed need of the District during the life of the Plan. Housing will be distributed across the District in urban and rural areas and Local Plan policies will ensure that a suitable mix of homes are provided to meet the needs of all people in the future. The increased supply of housing as a result of the policies and allocations could also have the effect of reducing house prices in the area, which was identified as a key sustainability at the scoping stage. The Local Plan also seeks to provide affordable housing that will also help to address this issue. Local Plan policies seek to protect the existing built environment and also require any new development to be well designed and be high quality.

- 5.13 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities to have a major long-term positive cumulative effect on the provision of housing, including affordable housing for the people living/migrating in the District.

#### ***Interrelationships with other Topics***

- 5.14 The provision of housing and associated delivery of services and facilities also has the potential for indirect positive effects on a number of other topics, which include economy and employment, communities and health and transport and accessibility. Conversely, the delivery of housing also the potential for negative effects on a number of topics, which include communities and health, transport and accessibility, air quality, climate change and flooding, water resources and quality, natural environment, cultural heritage and waste and recycling.

#### **Economy and Employment**

SEA Directive Topics: Population & Human Health  
NPPF paras 18-22

Relevant SA Objectives:

- SA Objective 1: To have a strong and stable economy

#### ***Appraisal of Publication Draft Local Plan Policies***

- 5.15 Policy DS1 has the potential for a major long-term positive effect on the economy and employment as it ensures that sufficient employment land is available to provide for the growth of the economy and meet the future needs of the District. The level of employment land to be provided during the life of the Plan is 66 ha and this is set out in Policy D8. This has the potential for a major long-term positive effect on the economy and employment. Policy DS9 is considered to have a similar effect as it allocates 19.7 ha employment at two strategic sites and allows for a further 6.5 ha at the sub-regional employment site set out in Policy D16. Policy D16 is also considered to have the potential for a major long-term positive effect as it allocates an employment site of sub-regional significance. This will help to support economic growth as well as the development of Advanced Manufacturing and Engineering which is a sub-regional priority.
- 5.16 Policy DS17 supports canal-side regeneration and enhancement with the preparation of a canal-side DPD. This along with Policy DS18 which supports the regeneration of the Lillington Local Shopping Centre have the potential for minor long-term positive effects on the economy and employment; however, there is still an element of uncertainty as there are no specific proposals. There is also the potential for minor positive effects through Policies EC1, EC2 and EC3 as they set out criteria for the permission of new

employment development and protect existing and committed employment land and buildings.

- 5.17 Policies TC1, TC2 and TC3 also have the potential for a minor long-term positive effect as they set out criteria for the permission of new retail development and protect existing and potential floorspace. Similar effects are likely as a result of Policies TC4 and TC5 as they support the redevelopment of the Chandos Street car park for retail and proposals for large scale shopping development in Royal Leamington Spa Town Centre. Policies TC6 to TC18 predominantly relate to changes of use and are unlikely to have significant effects. Policies MS1 and MS2 supports major sites which have an important role in the District's economy, with the potential for a minor long-term positive effect on the economy.
- 5.18 The Local Plan also supports the growth of tourism as a key part of the local economy. Policies CT1 to CT7 direct new tourism growth, which includes visitor accommodation and camping and caravan sites. Potential for a minor long-term positive effect on the economy. Development strategy policies that relate to the provision of housing (Policies DS2, DS7, DS10, DS11) are also likely to have indirect positive effects on this topic through supporting the provision of new employment land as well as existing employment and services/facilities in town centres.

### ***Appraisal of Site Allocations***

- 5.19 The appraisal considered that all of the site allocations are likely to have minor short to long-term indirect positive effects on the economy. The strategic allocations at Thickthorn and Land West of Europa Way were considered to have major positive effects through the provision of employment land as well as residential. Any allocations that had the potential to lead to the loss of existing employment were considered to have the potential for minor negative effects on the economy. The detailed appraisal of site allocations is provided in Appendix V and VI of this SA Report.

### ***Synergistic and Cumulative Effects***

- 5.20 Overall, the Local Plan will have major short to long-term positive cumulative effects on the economy and employment through the provision of 66 ha of employment land during the life of the Plan. Major allocations for employment have been distributed between Leamington, Kenilworth and the sub-regional employment area in the north of the District. The Local Plan protects existing employment as well as supports economic growth through both the regeneration of previously developed land as well as development of suitable Greenfield sites. It also seeks to maintain the shopping function of the town centres and support proposals that enhance their roles.
- 5.21 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities to have a major long-term positive cumulative effect on the economy and employment for the sub-region.

### ***Interrelationships with other Topics***

- 5.22 The provision of employment has the potential for indirect positive effects on communities and health and transport and accessibility. However, there is also the potential for negative effects on a number of topics, which include communities and health, transport and accessibility, air quality, climate change and flooding, water resources and quality, natural environment, cultural heritage and waste and recycling.

#### **Communities and Health**

SEA Directive Topics: Population & Human Health  
NPPF paras 23-27 & 69-78

Relevant SA Objectives:

- SA Objective 13: To protect, enhance and improve accessibility to local services and community facilities
- SA Objective 14: To improve health and well being
- SA Objective 15: To reduce poverty and social exclusion
- SA Objective 16: To reduce crime, fear of crime and antisocial behaviour

### ***Appraisal of Publication Draft Local Plan Policies***

- 5.23 Development strategy policies that seek the provision of housing and employment (Policies DS1, DS2, DS7, DS8, DS9, DS10, and DS11) have the potential to have negative effects in the short-term on communities and human health during construction, through increased levels of noise, light and air pollution. It is considered that there are suitable mitigation measures available to address short-term negative effects during construction. Policy BE3 does not permit development which has an unacceptable adverse impact on the amenity of nearby residents. The development strategy policies outlined above also have the potential for indirect long-term minor positive effects on communities and human health through improved accessibility to housing and employment as well as associated services and facilities.
- 5.24 Policies HS2, HS4, HS5, HS6 and HS8 are considered to have the potential for positive effects on communities and human health as they seek to protect and enhance existing community facilities as well as provide new facilities to meet demand. This includes open space, sports and recreation facilities as well as health facilities. Policy HS7 encourages development to minimise the potential for crime and anti-social behaviour through layout and design. The policy relating to Houses in Multiple Occupation and Student Accommodation will reduce the concentration of this type of accommodation in south Leamington and prevent such concentrations from forming elsewhere. This has the potential for positive effects on crime and anti-social behaviour.

- 5.25 Policy TR1 seeks to improve the choice and access to sustainable transport modes which could also have indirect minor positive effects through improving access to community facilities and services. Policy CC1 supports development proposals that provide energy efficiency housing to reduce fuel poverty and contribute to high quality, attractive and safe public realm to encourage social interaction. The overarching policy for sustainable communities covers a number of these areas so is also considered to have the potential for long-term positive effects.
- 5.26 It is important for all new development to be successfully integrated with existing communities. The overarching policy on sustainable communities requires new development to be high quality and ensure that it is brought forward in a way which enables strong communities. To achieve this they will need to deliver high quality layout and design to integrate with existing communities. Policy BE1 expects new development to harmonise with, or enhance, the existing settlement in terms of physical form, patterns of movement and land use as well as integrate with existing paths, streets, circulation networks and patterns of activity. These policies should help to ensure the integration of new development with existing communities and have long-term positive effects.

### **Appraisal of Site Allocations**

- 5.27 Short-term negative effects on communities and human health during construction were identified for the majority of site allocations. It was considered that this could be mitigated through appropriate phasing and an Environmental Management Plan (construction & occupation) where necessary. Some brownfield site allocations were identified as having the potential for contamination and it was recommended that a survey be carried out to identify potential contaminants and suggest appropriate mitigation as necessary. There were also some site allocations adjacent to or within close proximity to main roads or railways, which could have negative effects on health. It was considered that suitable mitigation is available to address any significant effects at the project level, which could include buffers between the roads/railways and any new development.
- 5.28 The majority of larger sites were considered to have the potential for a positive effect on access to local services and facilities, health and poverty and social exclusion. Given the capacity of the sites there is greater potential to support existing, as well as new, community facilities and services particularly as these sites are predominantly in and around larger settlements which provides them with better access. The village site allocations were considered to have the potential to both support and increase pressure on existing services and facilities. As the capacity of existing services and facilities is unknown, an uncertain effect was identified. The Red Farm House and Campion Hills allocations were identified as having the potential for a major long-term positive effect on access to community services and facilities and poverty and social exclusion as they are located adjacent to Lillington, the most deprived neighbourhood in the District. Development will help to regenerate the area and bring an improved quality and choice of housing as

well as improved local facilities. The detailed appraisal of site allocations is provided in Appendix V and VI of this SA Report.

### **Synergistic and Cumulative Effects**

- 5.29 The Local Plan seeks to protect and enhance accessibility to community facilities and services, which includes open space for recreation and health facilities. Provision is made for new community facilities and improvements to sustainable transport modes will help to improve accessibility. Policies support development that is of the highest quality and ensures that new development is integrated with existing communities and that the design and layout of proposals minimise the potential for crime and anti-social behaviour. The provision of housing and employment will help to meet the future needs of communities in the District and the amenity of residents is also protected. It is therefore considered that the Local Plan as a whole will have major positive cumulative effects in the long-term for communities and health.
- 5.30 The Local Plan supports the vision and aims of the Sustainable Community Strategy and is also likely to interact with the Local Plans of surrounding Local Authorities to have major long-term positive cumulative effects on communities and health.

### **Interrelationships with other Topics**

- 5.31 Communities and health can be indirectly affected by the nature and significance of effects on the majority of other topics. Positive effects on housing, employment and transport and accessibility can lead to indirect positive effects on communities and health. The impacts on environmental topics, such as air quality, water resources and quality and the natural environment can also either positively or negatively indirectly affect communities and health.

#### **Transport and Accessibility**

SEA Directive Topics: Population & Human Health  
NPPF paras 29-41

Relevant SA Objectives:

- SA Objective 2: To enable a range of sustainable transport options
- SA Objective 3: To reduce the need to travel

### **Appraisal of Publication Draft Local Plan Policies**

- 5.32 Development strategy policies (Policies DS1, DS2, DS7, DS8, DS9, DS10, and DS11) seek the provision of 12,860 new homes and 66 ha of employment land during the life of the Plan. The preferred spatial strategy (Policy DS4) focuses this development within the urban areas and on greenfield sites to the south of Warwick and Leamington Spa. Transport assessments indicate that the



provision of new housing and employment will result in increased levels of traffic with increased journey times and slower vehicle speeds. Without appropriate mitigation there is clearly the potential for these policies to have major long-term negative effects on the existing transport network.

- 5.33 During the various phases of the strategic transport assessment work a number of broad mitigation areas and measures have been proposed and tested to try and address the potential impacts on traffic as a result of proposed development. These mitigation areas include the A452 corridor between Leamington and Kenilworth, Leamington South and West, Warwick Town Centre and South West, Europa Way Corridor and the M40 (including junctions 14 and 15). The most recent strategic transport assessment<sup>86</sup> concluded that the potential impacts of proposed development in the Publication Draft Local Plan will be, in part, mitigated by the proposed measures but that some residual impacts would still occur. It notes that these residual impacts may occur through the allocation of natural background growth within the network and that the impacts are most likely to occur in the long-term near the end of the plan period. It is concluded that further refinement of the proposed mitigation measures along with more detailed work on measures which may reduce the car based trip generation through alternative sustainable modes would likely reduce the identified impacts of proposed development.
- 5.34 The Council has prepared an Infrastructure Delivery Plan (IDP) to set out the infrastructure requirements to support the proposals in the Draft Local Plan through until 2029. It ensures that new developments will be properly supported by the necessary transport infrastructure. Policies DS15 and BE2 relate to the development of strategic sites and require the production of development briefs that set out the requirement for infrastructure ensuring alignment with the IDP. Policy TP3 seeks contributions from all development that will lead to an increase in traffic on the road network with the level of contributions to be calculated in accordance with the IDP. These policies are therefore considered to have a positive effect on transport as they seek to ensure that all development brought forward within the Plan period provides the necessary infrastructure and contributes to its provision across the whole of the District's network. As identified within the most recent transport assessment, the potential impacts on the highways network will, in part, be mitigated by the highways infrastructure identified within the IDP.
- 5.35 To address the potential residual impacts identified through the transport assessment the IDP also sets out a range of sustainable travel infrastructure, which is supported by various Local Plan policies, which include:
- The overarching policy on sustainable communities requires new development to ensure access and circulation are inclusive and provide for a choice of transport modes including public transport, cycling and walking.

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<sup>86</sup> Warwickshire County Council (March 2014) Strategic Transport Assessment Phase 4 - Revised Development Allocation Testing.

- Policy BE1 expects development to demonstrate that they integrate with the existing paths and streets and make provision for convenient and integrated cycling and walking routes and for public transport. It also expects development to meet the highest standards of accessibility and inclusion for potential users regardless of disability, age or gender.
- Policy BE2 requires development briefs to be prepared for strategic sites that set out requirements for the design of health lifestyles including provision for cycling and walking as well as measures to manage and mitigate traffic generation.
- Policy TP1 only permits development which provides safe, suitable and attractive access routes for pedestrians, cyclists, public transport users, delivery vehicles and other users of motor vehicles. Development will also be expected to demonstrate that it is designed to provide suitable and attractive access and circulation for a range of transport modes including pedestrians, cyclists and public transport services.
- Policy TP2 requires all development that will result in the generation of significant transport movements to be supported by a Transport Assessment and where necessary a Travel Plan to demonstrate practical and effective measures to avoid adverse impacts on traffic. The measures should also take full account of the cumulative impact of all development proposed in the Local Plan.
- Policy TP3 requires contributions from development towards transport improvements, which includes the provision of public transport, footpaths, cycleways and towpaths both internal and external to the development site.
- Policy T4 supports development that does not encourage unnecessary car use and has regard to the location and accessibility of the site by means other than the private car.
- Policy HSI1 supports development that contributes to the development of a high quality, safe and convenient walking and cycling network.

- 5.36 These policies will have long-term positive effects on transport by supporting alternative modes of sustainable transport and seeking to reduce the impacts of development on the road network. The specific mitigation measures provided in the IDP along with the policies outlined above should address the potential impacts identified through the transport assessment and ensure that there are no major negative effects as a result of Local Plan policies.
- 5.37 There is also the potential for Local Plan policies that propose development to also have positive effects on transport and accessibility. The provision of housing and employment in and around existing urban areas as well as within the rural settlements could help to reduce the need to travel. However, it is likely that rural communities will still need to travel to access employment and community facilities and will remain dependent on the use of the private vehicle.

### ***Appraisal of Site Allocations***

- 5.38 All of the site allocations were considered likely to increase traffic and therefore have negative effects on transport with the significance of the effect being dependent on the size of the proposed development and its location. Generally it was the strategic sites that were considered to have the greatest impact on the road network. Based on transport assessments and mitigation measures available the appraisal concluded that the majority of sites are unlikely to have major negative effects on traffic.
- 5.39 The majority of site allocations were also considered to have long-term positive effects by potentially supporting improvements to public transport as well as walking and cycling routes. The significance of the effect again being dependent on the scale and location of the proposed development. This also influences the nature and significance of the effect on reducing the need to travel. The larger strategic sites around existing urban areas are more likely to help reduce the need to travel. The detailed appraisal of site allocations is provided in Appendix V and VI of this SA Report.

### ***Synergistic and Cumulative Effects***

- 5.40 Local Plan policies seek to address the impacts of proposed development on the road network and ensure that appropriate infrastructure is provided. The IDP sets out a range of highways and sustainable transport infrastructure that will need to be delivered during the life of the Plan to support proposed development. Local Plan policies also seek to improve public transport and pedestrian routes and encourage the use of sustainable transport modes. These measure as along with the delivery of housing, employment and community facilities/ services has the potential for a long-term positive cumulative effect on transport and accessibility.

### ***Interrelationships with other Topics***

- 5.41 Positive effects on transport and accessibility can lead to indirect positive effects on communities and health. There is also the potential for indirect positive effects on environmental topics such as air and water quality.

#### **Air Quality**

SEA Directive Topics: Air  
NPPF paras 109-125

Relevant SA Objectives:

- SA Objective 9: To create good quality air, water and soils

### ***Appraisal of Publication Draft Local Plan Policies***

- 5.42 Development strategy policies (Policies DS1, DS2, DS7, DS8, DS9, DS10, and DS11) seek the provision of 12,860 new homes and 66 ha of employment land during the life of the Plan. The preferred spatial strategy (Policy DS4) focuses this development within the urban areas and on greenfield sites to the south of Warwick and Leamington Spa. Proposed development has the potential to increase levels of traffic and therefore atmospheric pollution within the District, which could have negative effects on air quality. There are three Air Quality Management Areas (AQMA) within the District, in Warwick, Leamington Spa and Kenilworth.
- 5.43 The transport assessments undertaken by the Council considered the potential impacts of increased traffic within the AQMAs. A more detailed assessment of the potential impacts on the AQMAs was carried out and published in November 2013. The Air Quality Assessment (AQA) found that in the short-term, nitrogen dioxide objectives will continue to be exceeded in both the Warwick and Leamington Spa AQMAs. It states that concentrations of nitrogen dioxide are predicted to be much lower in 2028 than in 2011 as a result of stringent emissions controls on new vehicles via Euro standards. In 15 years' time these vehicles will make up the majority of cars on the roads in the UK. The AQA also predicts that background concentrations will be substantially reduced in 15 years' time as a result of reductions in various contributing sectors. It should be noted that the findings of the AQA rely on new vehicles meeting the emission control standards coming into force.
- 5.44 Given the findings of the AQA and predicted trends in air quality, it is considered that the policies within the Plan and proposed development will not have major negative effects on air quality in the long-term. However, there is still an element of uncertainty given the reliance on new vehicles meeting the emission control standards coming into force. In the short-term there is the potential for negative effects; however, Local Plan policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes as well as encourage the use of sustainable transport modes. The positive effects and mitigation provided by Policies TP1, TP2, TP3 and TP4 should ensure that short-term negative effects are not significant.

### ***Appraisal of Site Allocations***

- 5.45 A number of site allocations were identified as having the potential for negative effects on air quality as a result of increased traffic. The significance of the effect was dependent on the scale of proposed development and location of the site. It was considered that there is suitable mitigation available to ensure that significant negative effects would not occur. Following consideration of the mitigation provided by Local Plan policies and predicted trends in air quality, it is considered unlikely that any of the proposed site allocations will have negative effects on air quality.

### ***Synergistic and Cumulative Effects***

- 5.46 It is considered that major negative effects on air quality are unlikely as a result of the Local Plan. Policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes as well as encourage the use of sustainable transport modes. While there may be some localised impacts in the short-term as a result of proposed development, the mitigation proposed through Local Plan policies and predicted trends in air quality will ensure that these are not significant.

### ***Interrelationships with other Topics***

- 5.47 Air quality is closely linked with transport and accessibility as increased levels of traffic can result in increased levels of atmospheric pollution. Given the findings of the SA for air quality and transport and accessibility it is considered that there is the potential for indirect long-term positive effects on air quality. This has the potential for long-term indirect positive effects on health, water quality and the natural environment.

#### **Climate Change and Flooding**

SEA Directive Topics: Climatic Factors & Water  
NPPF paras 93-104 & 120

Relevant SA Objectives:

- SA Objective 10: To minimise the causes of climate change by reducing greenhouse gases and increasing the proportion of energy generated from renewable and low carbon sources
- SA Objective 11: To adapt to the predicted impacts of climate change including flood risk

### ***Appraisal of Publication Draft Local Plan Policies***

- 5.48 Development strategy policies (Policies DS1, DS2, DS7, DS8, DS9, DS10, and DS11) seek the provision of 12,860 new homes and 66 ha of employment land during the life of the Plan. This has the potential for negative effects on climate change as the provision of new housing and employment could result in increased levels of traffic and therefore greenhouse gas emissions. However, given the findings of the SA for the transport and accessibility and air quality topics above, it is considered unlikely that Local Plan policies will have negative effects on climate change through increased greenhouse gas emissions. Please refer to the transport and accessibility and air quality topics above.
- 5.49 There is also the potential for negative effects through the embodied energy inherent in the construction and maintenance of development. Processing

methods and technologies are likely to improve reducing the amount of embodied energy used; however this is uncertain.

- 5.50 There are a number of Local Plan policies that seek to improve energy efficiency and support low carbon and renewable energy, which have the potential for a long-term positive effect on climate change. These policies include:
- The overarching policy on sustainable communities seeks to minimise energy consumption and promote renewable energies where possible.
  - Policy CC2 supports proposals for new low carbon and renewable energy technologies subject to a number of criteria.
  - Policy CC3 requires all new residential development to achieve Code for Sustainable Homes Level 4 from the adoption of the Local Plan and level 5 from 2016. It also requires non-residential development over 500 sq. m to achieve BREEAM standard 'very good'. In meeting these targets the Council expects development to be designed according to the energy hierarchy, which is firstly to reduce energy demand through energy efficiency measures, then supply energy through efficient means and finally the generation of renewable energy. The policy also expects applicants to consider the potential to incorporate large scale decentralised energy systems on strategic sites.
- 5.51 Climate change adaptation and in particular flooding is a significant issue for most areas in the UK and was identified through the scoping as a key sustainability issue for the District. Local Plan policies seek to ensure that development is directed away from areas of flood risk and that it does not increase the risk of flooding, which has the potential for a long-term positive effect. These policies include:
- The overarching policy on sustainable communities seeks to manage flood risk to ensure that proposals do not unduly increase the risk of flooding.
  - Policy CC1 requires all development to be resilient to and adapt to the future impacts of climate change through the inclusion of a number of measures which includes the incorporation of water efficiency measures, minimising vulnerability to flood risk and including sustainable drainage systems, optimising the use of Green Infrastructure and using a variety of methods to mitigate against rising temperatures.
  - Policy FW1 directs development away from areas of flood risk and sets criteria for development following the application of the sequential test.
  - Policy FW2 requires appropriate sustainable drainage systems in all developments.
- 5.52 Given the policy mitigation above it is considered unlikely that the development proposed in Policies DS1, DS2, DS7, DS8, DS9, DS10, and DS11 will have major negative effects on flooding through the introduction of increased impermeable surfaces. A proportion of some of the proposed development sites within Policy DS11 are within areas of medium to high flood

risk<sup>87</sup> so there is the potential for negative effects. However, it is considered that development within these sites can be directed away from the areas of flood risk and ensure that major negative effects will not occur.

### ***Appraisal of Site Allocations***

- 5.53 All of the site allocations were considered likely to increase traffic and therefore have minor indirect negative effects on climate change through increased emissions of greenhouse gases. However, based on transport assessments and mitigation measures available the appraisal concluded that the majority of sites are unlikely to have major negative effects. All site allocations were considered to have the potential to include some form of energy generation from low carbon or renewable sources.
- 5.54 The majority of proposed site allocations are not within areas of medium to high flood risk. A proportion of some of the proposed site allocations are within an area of medium to high flood risk; however, in these cases it is considered that development can be directed away from the areas of flood risk. Local Plan policies direct development away from areas of flood risk so there are unlikely to be any major negative effects. Some of the site allocations were identified as having potential surface water flooding issues; however, it was again considered that suitable mitigation measures are available at the project level to address negative effects.
- 5.55 The majority of the site allocations were considered to have the potential for minor negative effects on flooding through the introduction of impermeable surfaces; it was considered that there is suitable mitigation available at the project level to address negative effects. The NPPF and Local Plan policies require that new development does not increase the risk of flooding elsewhere. The detailed appraisal of site allocations is provided in Appendix V and VI of this SA Report.

### ***Synergistic and Cumulative Effects***

- 5.56 Local Plan policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes and encourage the use of sustainable transport modes. These measures along with predicted trends in air quality should ensure that the Local Plan does not have major long-term negative effects on climate change as a result of increased traffic. There is also the potential for the Local Plan to have negative cumulative effects through the embodied energy inherent in the construction and maintenance of development. Processing methods and technologies are likely to improve reducing the amount of embodied energy used; however this is uncertain.
- 5.57 There are a number of Local Plan policies that seek to improve energy efficiency and support low carbon and renewable energy, which have the potential for a long-term positive cumulative effect on climate change.

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<sup>87</sup> Warwick District Council (2013) Level 1 Strategic Flood Risk Assessment. Prepared by Mouchel.



- 5.58 Local Plan policies seek to ensure that development is directed away from areas of flood risk, that it does not increase the risk of flooding and incorporates sustainable drainage systems. It is considered that the cumulative effect of the Local Plan will be neutral on flooding given the mitigation measures available. There is an element of uncertainty as this is dependent on the implementation of mitigation measures.
- 5.59 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities that are also proposing development. In the short-term there are likely to be negative cumulative effects on climate change; however, there is the potential for positive effects in the long-term. The cumulative effect of the Local Plan with other Plans and Programmes is likely to be positive in the long-term for flooding.

### ***Interrelationships with other Topics***

- 5.60 The nature and significance of effects on climate change and flooding is closely linked to housing, employment and transport. Flooding is also closely linked to communities and human health as well as water quality. Increased flood risk can have negative effects on human health as well as indirect negative effects on water quality and the economy.

#### **Water Resources and Water Quality**

SEA Directive Topics: Water  
NPPF paras 109-125

Relevant SA Objectives:

- SA Objective 5: To ensure the prudent use of land and natural resources
- SA Objective 9: To create good quality air, water and soils

### ***Appraisal of Publication Draft Local Plan Policies***

- 5.61 Negative effects are most likely to arise as a result of policies in the Development Strategy, that set out the quantum and location of growth. Higher level policies, such as Policies DS1, DS2 and DS4, are considered to have uncertain effects as the the quantum and specific location of development are set out in other Local Plan policies. Policies DS6 and DS8 seek the delivery of 12,860 homes and 66 ha of employment land during the life of the Plan, which have the potential for significant long-term negative effects on water resources and quality through increasing the levels of water abstracted for drinking and increasing the levels of consented discharges. The increased area of impermeable surfaces as a result of development can also have impacts on water quality through the transfer of pollutants in surfacewater run-off. The location for development is set out in Policies DS9 and DS10 and while there is the potential for negative effects; these are more appropriately addressed through the consideration of specific site allocations.



5.62 There are a number of Local Plan policies that seek to protect the water environment and minimise the impacts of development. These policies have the potential for a positive effect on this topic and include:

- The overarching policy on sustainable communities seeks all new development to deliver high quality layout and design, which includes minimising water consumption.
- Policy CC1 (Planning for Climate Change Adaptation) requires all development to seek the inclusion of water efficiency measures, encouraging the use of grey water and rainwater recycling where appropriate.
- Policy FW2 (Sustainable Urban Drainage) requires appropriate sustainable drainage systems in all developments.
- Policy FW3 (Water Conservation) encourages all new residential development of one dwelling or more to meet a standard of 110 litres/person/day in terms of water efficiency.
- Policy FW4 (Water Supply) expects developers to ensure that there is adequate water supply to serve existing and proposed developments by minimising the need for new infrastructure, ensuring any infrastructure is provided alongside the development and ensuring any new infrastructure does not have a detrimental impact on existing systems and the environment.
- Policy NE5 (Protection of Natural Resources) expects development proposals to demonstrate that they do not give rise to water pollution where it could have harm on sensitive receptors and does not result in a reduction in the quality or quantity of groundwater resources.
- Policy CC3 requires all new build residential development of one dwelling or more to achieve Code for Sustainable Homes Level 4 from the adoption of the Local Plan and level 5 from 2016 unless it can be demonstrated that it is financially unviable.

5.63 The Warwickshire sub-regional Water Cycle Study (2010) recommends that given the current and predicted supply-demand deficit, Warwick District Council should seek that all new development is built at Code for Sustainable Homes (CSH) level 3/4 for water efficiency as a minimum. To meet CSH level 3 new development would need to meet a minimum standard of 105 litres/person/day and for level 4 it is 90 litres/person/day<sup>88</sup>. While it is understood that Government Guidance recommends that development as a minimum should not exceed 125 litres/person/day<sup>89</sup>, it is considered that Policy FW3 could be strengthened and better aligned with Policy CC3. It is therefore recommended that Policy FW3 should be amended to encourage all new residential development of one dwelling or more to meet a standard of 90 litres/person/day in terms of water efficiency. This would bring it in line with Policy CC3, which seeks all new residential development to meet CSH level 4 from the adoption of the Local Plan as well as the Water Cycle Study.

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<sup>88</sup> CLG (2010) Code for Sustainable Homes - Technical Guide.

<sup>89</sup> DCLG (2010) Building Regulations Approved Documents: Part G (sanitation, hot water safety and water efficiency)

- 5.64 Given the mitigation provided by Local Plan policies above, current regulatory processes, such as the WRMP, and with the recommendation above, it is considered that any potential significant negative effects as a result of Local Plan Policies can be addressed. The residual effects are considered to be neutral with an element of uncertainty as they will be dependent on the implementation of mitigation measures.

### ***Appraisal of Site Allocations***

- 5.65 The SA of site allocations identified that there is the potential for minor negative effects on the water quality for a number of proposed developments as there may be a watercourse present on the site or it may be located on a sensitive receptor (water protection zone) . It was concluded that none of the allocations are likely to have significant negative effects given the mitigation measures available at the project level. The detailed appraisal of site allocations is provided in Appendix V and VI of this SA Report.

### ***Synergistic and Cumulative Effects***

- 5.67 Overall, the Local Plan is considered to have the potential for minor negative cumulative effects on this topic through the provision of 12,860 homes and 66 ha of employment land during the life of the Plan. Local Plan policies protect the water environment and encourage the inclusion of water efficiency measures and sustainable drainage systems as well as the provision of necessary infrastructure. Mitigation measures should ensure that negative cumulative effects are not significant.
- 5.68 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities that are also proposing development. There is the potential for long-term negative cumulative effects on the water environment.

### ***Interrelationships with other Topics***

- 5.69 The water environment is influenced by and affects a number of the topics considered through this SA. Potential negative effects on water resources and quality can also have indirect negative effects on communities and human health and the natural environment. Similarly, improvements to water resources and quality can also have benefits for these topics. Given that the appraisal has found that there is not likely to be negative effects on the water environment, it is considered unlikely that there would be any major indirect negative effects on any other topics.

### **Natural Environment (Landscape, Flora and Fauna and Soils)**

SEA Directive Topics: Biodiversity, Flora, Fauna, Soil and Landscape  
NPPF paras 17, 79-92 & 109-125

Relevant SA Objectives:

- SA Objective 5: To ensure the prudent use of land and natural resources
- SA Objective 6: To protect and enhance the natural environment
- SA Objective 9: To create good quality air, water and soils

### **Appraisal of Publication Draft Local Plan Policies**

- 5.70 This topic covers a range of key issues including the landscape, biodiversity and soils. Negative effects are most likely to arise as a result of policies that set out the quantum and location of proposed growth. Higher level policies, such as Policies DS1, DS2 and DS4, are considered to have uncertain effects as the quantum and specific location of development are set out in other Local Plan policies. Policies DS6 and DS8 seek the delivery of 12,860 homes and 66 ha of employment land during the life of the Plan, which has the potential for major long-term negative effects on the natural environment.
- 5.71 The spatial strategy (Policy DS4) seeks to direct housing and employment in the first instance on previously developed land within urban areas. This is positive for the natural environment as while brownfield sites can be important it is generally greenfield sites that have greater value. The spatial strategy seeks to avoid development in areas with high landscape or natural environment value as well as limit development in the Green Belt. Given existing constraints the spatial strategy means that development during the life of the Plan will be focussed within urban areas and to the south of Warwick and Leamington.
- 5.72 The location for development is set out in Policies DS10 and DS11 and would result in the loss of large areas of greenfield land as well as some areas of Green Belt. This has the potential for major long-term negative effects on the loss of green space as well as the landscape. The Council is restricted in terms of potential options for development given existing constraints, in particular the Green Belt, and available sites. Various landscape studies and Green Belt reviews<sup>90</sup> have been undertaken to inform the development of the Local Plan. This has included assessments of the potential strategic areas for growth set out in Policies DS10 and DS11. The majority of the strategic areas were assessed as having either low or medium landscape value. Land to the South of Harbury Lane was assessed as having medium to high landscape value but that sensitive development could occur and be contained naturally by Tach Brook.

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<sup>90</sup> Local Plan Evidence Base. Available online:  
[http://www.warwickdc.gov.uk/info/20416/evidence\\_base](http://www.warwickdc.gov.uk/info/20416/evidence_base)

5.73 Local Plan policies that seek to protect and enhance the Green belt, landscape and Green Infrastructure have the potential for long-term positive effects on this topic. These include:

- Policy DS3 seeks to facilitate high quality development and protect areas of significance including high quality landscapes.
- Policy DS19 will apply Green Belt policy in accordance with government guidance as set out in the NPPF.
- The overarching policy for sustainable communities requires new development to be high quality and protect and where possible enhance the natural environment including important landscapes.
- Policy BE1 expects development proposals to demonstrate that they relate well to local topography and landscape features.
- Policy BE2 requires developments over 200 dwellings to comply with a development brief that will set out requirements for landscaping.
- Policy NE1 seeks to protect, enhance and restore the District's Green Infrastructure assets and strive for a healthy integrated network for the benefit of nature, people and the economy. This allows for planning at a variety of spatial scales.
- Policy NE4 permits new development that positively contributes to the landscape character and requires development proposals to demonstrate that they integrate landscape planning at an early stage and acknowledge cumulative effects.

5.74 Given the findings of the SA for other topics, such as transport, air quality and water resources and quality, it is considered unlikely that there will be any major negative effects on biodiversity as a result of increased pollution. The location for development is set out in Policies DS10 and DS11 and while there is the potential for negative effects at a local level through the loss of habitats; these are more appropriately addressed through the consideration of specific site allocations. The key negative effect likely to arise as a result of development strategy policies is related to the overall loss and fragmentation of habitats. Important habitat corridors should be protected and maintained as the connectivity of habitats is important for the long-term integrity of biodiversity.

5.75 Local Plan policies seek to protect and enhance biodiversity, which has the potential for short to long-term positive effects. Policies NE2 and NE3 have the potential for positive effects as they seek to protect, enhance and restore both nationally and locally important biodiversity. Development will be expected to ensure that there is no net loss of biodiversity and negative impacts are avoided. Development will not be permitted unless it can demonstrate through an ecological assessment that appropriate mitigation or compensatory measures are available to address impacts, which should also include measures for long term management of biodiversity. Importantly, the Local Plan also seeks to protect, enhance and restore the District's green infrastructure assets and strive for a healthy integrated network for the benefit of nature. A Green Infrastructure Study (2010) and GI Delivery Assessment (2012) have helped to inform the development of the policies in the emerging

Local Plan. The policies should mitigate the potential negative effects of development strategy policies with the potential for long-term positive effects on biodiversity. It should be noted that the Habitats Regulations Assessment Screening Report (2014) for the Local Plan concluded that there would not be likely significant effects on any European sites designated for nature conservation (Special Protection Areas, Special Conservation Areas and Ramsar sites).

- 5.76 The Council intend to prepare and adopt a Canal-side DPD to support regeneration and enhancement. Canals can provide important habitats for wildlife as well as important corridors for movement. It is recommended that the importance of Canals for biodiversity should be a key consideration in the development of the DPD.
- 5.77 There is the potential for major long-term negative effects on the natural environment through the loss of best and most versatile agricultural land. Sites allocated in Policies DS10 and DS11 are identified as best and most versatile agricultural land to the south of Warwick and Leamington as well as the Thickthorn site to the south east of Kenilworth<sup>91</sup>. Policy NE5 expects development proposals to demonstrate that they avoid the best and most versatile agricultural land unless the benefits of the proposal outweigh the need to protect the land for agricultural purposes.

### ***Appraisal of Site Allocations***

- 5.78 Site allocations that would lead to the loss of Green Belt land were considered to have the potential for major negative effects on landscape. There were also some greenfield sites identified as potentially having major negative effects on landscape. This depended on the scale of proposed development as well as the sensitivity or landscape value of the site. It was concluded that there are mitigation measures available to address significant effects. Site allocations that would lead to the loss of best and most versatile agricultural land were appraised as having the potential for major negative effects on the prudent use of land.
- 5.79 The majority of sites were considered unlikely to have major negative effects on biodiversity. Suitable mitigation measures are available at the project level to address adverse effects; however, there is still an element of uncertainty until project level surveys and assessments have been carried out. The detailed appraisal of site allocations is provided in Appendix V and VI of this SA Report.

### ***Synergistic and Cumulative Effects***

- 5.80 The level of growth proposed through the Local Plan has the potential for major long-term negative effects on the natural environment. To address this, the Local Plan seeks to direct development away from sensitive areas and also protect, enhance and restore the natural environment. The mitigation provided by Plan policies and available at the project level should address

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<sup>91</sup> Magic Map - Agricultural Land Classifications. Available online: <http://www.magic.gov.uk/>

negative effects to ensure they are not significant for the landscape or biodiversity; however, the overall cumulative effect of the Local Plan remains uncertain. The Local Plan will lead to the loss of large areas of best and most versatile agricultural land.

- 5.81 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities that are also proposing development. Cumulatively there is the potential for long-term negative effects on the natural environment.

### **Cultural Heritage**

SEA Directive Topics: Cultural Heritage  
NPPF paras 126-141

Relevant SA Objectives:

- SA Objective 8: To protect and enhance the historic environment

### ***Appraisal of Publication Draft Local Plan Policies***

- 5.82 Policies DS1 and DS2 seek to provide employment and housing to meet the future needs of the District. The level of proposed growth is set out in Policies DS6 and DS8 which seek the delivery of 12,860 homes and 66 ha of employment land during the life of the Plan. While there is the potential for significant negative effects as a result of the level of growth proposed, the nature and significance of the effect as a result of these policies is uncertain, as it is dependent on the precise location of proposed development which is set out in other Local Plan policies. Policy DS7 sets out how the housing land requirements will be met; however, it does not provide specific locations so is considered to have a similar effect to Policies DS1 and DS2.
- 5.83 Policy DS4 (Spatial Strategy) sets out the preferred spatial strategy for distributing proposed growth, which is to firstly focus development on previously developed land within urban areas and then greenfield sites on the edge of urban areas. Development in the Green Belt is limited to those locations where exceptional circumstances can be justified. Given that the majority of the District is designated as Green Belt Land the spatial strategy means that the majority of development will be focussed within the urban areas and to the south of the District. This has the potential for significant long-term negative effects on heritage in that area, which includes Warwick Castle and its historic park and garden (Grade I listed) along with a number of listed buildings and Scheduled Monuments.
- 5.84 The Landscape Character Assessment (LCA) for Land South and Leamington notes that Warwick and Leamington Spa have highly-valued historic cores and Warwick Castle and the associated Castle Park have national heritage significance. The LCS states that “protecting the setting of these features must be considered a principal goal of future development planning in the



locality"<sup>92</sup>. However, as for Policies DS1 and DS2 there is still an element of uncertainty for Policy DS4 as the nature and significance of effect still depends on the precise location of development. To address the potential adverse effects on heritage, Policy DS4 states that sites which would have an impact on the significance of heritage assets will be avoided.

- 5.85 Policies DS9 and DS10 allocate sites for residential and employment development based on the spatial strategy. While none of the proposed sites are likely to lead to the complete loss or destruction of designated heritage assets there is still the potential for major long-term negative effects. Issues for specific sites are more appropriately addressed through the consideration of specific site allocations.
- 5.86 There are a number of Local Plan policies that seek to protect and enhance heritage and minimise the potential impacts of development. These policies have the potential for a positive effect on this topic and include:
- Policy D3 (Supporting Sustainable Communities) seeks to facilitate high quality new development which includes caring for built, cultural and natural heritage.
  - Policy DS4 avoids sites that would have an impact on the significance of heritage assets.
  - Policy GT2 (Criteria for assessing G&T sites) sets out the criteria for which G&T sites will be assessed against, this includes the impact on heritage assets and their setting.
  - The overarching policy on sustainable communities seeks that development should protect and where possible enhance, the historic environment and particularly designated heritage assets such as listed buildings, registered parks and gardens and conservation areas.
  - Policy BE1 expects new development to reflect, respect and reinforce local architectural and historical distinctiveness.
  - Policy BE2 expects strategic development sites over 200 dwellings to comply with a development brief that will set how the proposal will meet the requirements of Policy BE1.
  - Policy HE1 (Protection of Statutory Heritage Assets) seeks to protect heritage and refuse planning permission for any proposals that adversely affect the special architectural, historic interest, integrity or setting of Listed Buildings.
  - Policy HE2 (Protection of Conservation Areas) expects development to respect the setting of Conservation Areas and important views both in and out of them. Any new development should make a positive contribution to the local character and distinctiveness of the Conservation Area.
  - Policy HE3 restricts the erection of advertisement hoardings within Conservation Areas.
  - Policy HE4 (Protecting Historic Parks and Gardens) will not permit development if it would result in substantial harm to the historic structure,

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<sup>92</sup> Warwick District Council (Feb 2009) Landscape Character Assessment for Land South of Warwick and Leamington

character, principal components and setting of Parks and Gardens of Special Historic Interest.

- Policy H5 (Locally Listed Historic Assets) strongly resists development that would lead to the demolition or loss of significance of a locally listed historic asset.
- Policy H6 (Archaeology) will not permit development which results in substantial harm to Scheduled Monuments or other archaeological remains of national importance and their settings.

5.87 Local Plan policies seek to protect and enhance the historic environment of the District and avoid development that would have an impact on the significance of heritage assets. There are measures in place to ensure that development proposals take account of potential impacts on heritage and provide appropriate mitigation where necessary. It is therefore considered that there are suitable mitigation measures available to ensure that Local Plan policies will not have major negative effects on heritage. However, there is still an element of uncertainty until project level assessments have been carried out and mitigation measures have been implemented.

### ***Appraisal of Site Allocations***

5.88 The majority of site allocations were considered to either have uncertain or minor negative effects on heritage as they are within close proximity to Listed Buildings or close proximity/ within Conservation Areas. The appraisal concluded that there would be suitable mitigation available to address potential negative effects. The appraisal also identified the potential for positive effects for some of the urban sites as the redevelopment of brownfield sites can have positive effects on heritage in the long-term.

5.89 The strategic development at Thickthorn was identified as having the potential for a major negative effect on heritage as Thickthorn Manor and Stables (Grade II Listed Buildings) is adjacent to the site and a small portion of the north east of the site contains part of a Scheduled Monument (Roman settlement at Glasshouse Wood). Stoneleigh Abbey Historic Park and Garden (Grade II) is also adjacent to the eastern boundary of the site, albeit separated by the A4693. The Scheduled Monument is already bisected by the A46 and the section of designated land within the boundary of the site is currently being used as a sports ground. The detailed appraisal for the site recommended that any proposal for development would need to demonstrate that there is no significant adverse effect to important heritage, in particular the Scheduled Monument and its setting.

5.90 Policy BE1 ensures that the Council will refuse any proposal for development at Thickthorn that might adversely affect statutory heritage. It is considered that this along with the other mitigation provided by Local Plan policies will ensure that negative effects are not significant. However, there is still an element of uncertainty until project level assessments have been carried out and mitigation measures have been implemented.

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<sup>93</sup> English Heritage - The National Heritage List for England. Available online: <http://list.english-heritage.org.uk/mapsearch.aspx>



### ***Synergistic and Cumulative Effects***

- 5.91 Overall the Local Plan seeks to protect and enhance heritage as well as avoid development that would have an impact on the significance of heritage assets. It seeks to direct development to the available and suitable areas with the least constraint. Whilst it is recognised that development has the potential for negative effects on heritage it is also considered that there is the opportunity for positive effects by enhancing assets and promoting improved access. There is suitable mitigation available to address negative effects to ensure that they are not significant; however, the overall cumulative effect of the Local Plan on heritage remains uncertain.

### ***Interrelationships with other Topics***

- 5.92 Heritage has links to a number of other topics as it can be affected by housing and employment as well as the natural environment (landscape impacts). The protection and enhancement of heritage can also have indirect positive effects on communities and health.

#### **Waste and Recycling**

SEA Directive Topics: Material Assets  
NPPF para 5

Relevant SA Objectives:

- SA Objective 4: To reduce the generation of waste and increase recycling

### ***Appraisal of Publication Draft Local Plan Policies***

- 5.93 The proposed delivery of 12,860 homes and 66 ha of employment land during the life of the Plan through Policies DS1, DS2, DS6, DS7, DS8, DS9, DS10 and DS11 has the potential for short to long-term negative effects on waste. In the short-term waste will be created during construction and in the long-term as a result of additional households and employment areas generating waste day to day.
- 5.94 Policy BE1 (Layout and Design) has the potential for a positive effect as it expects development proposals to make sufficient provision for sustainable waste management, which includes facilities for kerbside collection, waste separation and minimisation. Any development will also need to be in accordance with the Warwickshire County Council Waste Core Strategy as per Local Plan Policy W1 (Waste Core Strategy). Policy W2 ensures that as part of the review for the Waste Core Strategy, Warwick District Council will work with Warwickshire County Council to identify a suitable site for either extending facilities on an existing site or a new facility on previously developed/industrial site within or close to the edge of the towns of Royal Leamington Spa, Warwick and Kenilworth.

- 5.95 The mitigation measures provided by policies BE1, W1 and W2 should ensure that the negative effects of providing 12,860 homes and 16 ha of employment land through Policies DS1, DS2, DS6, DS7, DS9, DS10 and DS11 are not significant.

### ***Appraisal of Site Allocations***

- 5.96 The site allocations and village site allocations were appraised as all having the potential for a minor negative effect on this topic as waste created in the short term during construction and in the long term as a result of additional households generating waste day to day. Local Plan policies should ensure that potential effects are not significant; however, the appraisal recommends that the Council require a waste management plan to accompany any proposal for development; which should include provision of space for storage of recycling facilities per dwelling. The detailed appraisal of site allocations is provided in Appendix V and VI of this SA Report.

### ***Synergistic and Cumulative Effects***

- 5.97 Overall, the Local Plan is considered to have the potential for minor negative cumulative effects on this topic through the provision of 12,860 homes and 66 ha of employment land during the life of the Plan. Local Plan policies expect development proposals to make sufficient provision for sustainable waste management and they also allow for sufficient flexibility to address increased future demand for waste facilities as a result of proposed development.
- 5.98 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities to have a minor negative cumulative effects on waste. The Warwickshire Waste Core Strategy will ensure that there is sufficient waste management capacity to address waste arising as a result of proposed development in Warwick District and other LAs within the Warwickshire County.

### ***Interrelationships with other Topics***

- 5.99 There are not considered to be any strong links to other topics given that significant negative or positive effects on waste and recycling are unlikely.

## 6.0 Implementation and Monitoring

### Introduction

- 6.1 This section discusses indicators and targets to help monitor the sustainability effects of the Local Plan. Targets and/or indicators for each sustainability objective have been identified (from the SA Framework) to provide a suggested list for discussion, and refined further to consider the significant sustainability effects of the plan, as required by the SEA Directive/ Regulations.

### Monitoring Requirements

- 6.2 The SEA Regulations require that the SA develops measures for monitoring the significant effects of the Local Plan. Current SA guidance states that monitoring will enable Local Planning Authorities 'to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions<sup>94</sup>.' Government Guidance also requires that the monitoring results from the SA 'should be reported in the local planning authority's Monitoring Report<sup>95</sup>.'
- 6.3 The aim of SA monitoring is to set a framework to show whether progress is being made towards sustainable development throughout the Local Plan's plan period. This section discusses indicators and targets to help monitor the sustainability effects of the Local Plan. Targets and/or indicators for each sustainability objective have been identified (from the SA Framework) to measure the significant sustainability effects of the plan, as required by the SEA Directive. Additional suggestions from consultees have been included.
- 6.4 Monitoring arrangements should be designed to:
- highlight significant effects;
  - highlight effects which differ from those that were predicted; and
  - provide a useful source of baseline information for the future.

### SA monitoring proposals for Warwick District Council's Local Plan

- 6.5 Planning legislation requires local planning authorities to produce Monitoring Reports (MR), which should include the findings of SA monitoring. Accordingly, the monitoring strategy for the SA should be integrated with the Local Plan MR. When preparing the Local Plan MR, the Council will consider this SA chapter to ensure recommended monitoring proposals are included, where practicable.

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<sup>94</sup> Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

<sup>95</sup> Department for Communities and Local Government (2014) National Planning Practice Guidance Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

- 6.6 The table below contains a list of proposed SA indicators to be incorporated into the MR as considered appropriate by Council. These take into account consultation comments received throughout the SA process and will be reduced and further refined for the Submission Local Plan Document.

**Table 6.1 Proposed monitoring indicators**

Indicators
<b>1. To have a strong and stable economy</b>
1. Amount of employment land with planning permission by type 2. Percentage of enterprises in knowledge intensive services (i.e. creative and digital industries, high value manufacturing, ICT, financial, professional and public services) 3. Amount of completed employment floor space by type 4. Level of unemployment in Warwick District 5. Potential Indicator - Number / percentage of working age population in employment 6. Number of working age population claiming workless benefits by type 7. Number of new business registrants per annum 8. Amount of completed retail, office and leisure floorspace 9. Number of Super Output Areas within the top percentiles of skills deprivation nationally 10. Young people not in education, employment and training (NEET)
<b>2. To enable a range of sustainable transport options</b>
11. Number of bus and train passenger journeys (NB: This indicator may not be collected in the future) 12. Percentage of people aged 16 to 74 who travel to work via <ul style="list-style-type: none"> <li>o bicycle and foot</li> <li>o bus and train</li> </ul> 13. Traffic speed in main towns (NB: This indicator may not be collected in the future)
<b>3. To reduce the need to travel</b>
14. Average annual daily traffic flows in main towns NB: This indicator may not be collected in the future. 15. Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and major health centre 16. Potential Indicator - Distance to nearest local shopping centre 17. Percentage of households within set distances of key services via the road network 18. Potential Indicator - Average distance travelled to fixed place of work 19. Percentage of people aged 16 to 74 who travel to work via car
<b>4. To reduce the generation of waste and increase recycling</b>
20. Total amount of waste per head of population 21. Percentage of total waste per head that is recycled 22. Percentage of total waste per head that is composted
<b>5. To ensure the prudent use of land and natural resources</b>
23. Densities of developed dwellings 24. Percentage of dwellings on previously developed land (i.e. new and converted buildings) 25. Amount of developed employment land by type which is on previously developed land 26. Potential Indicator - Proportion of homes being built to Code Levels 4, 5 and 6
<b>6. To protect and enhance the natural environment</b>

27.Changes in areas and populations of biodiversity importance (AMR).
28.Potential Indicator - Planning applications decided within (in part) or adjacent to a Local Wildlife Site or potential Local Wildlife Site
29.% of SSSIs in Favourable or Unfavourable Recovering condition (Natural England).
30.Potential Indicator - Achievement of Biodiversity Action Plan targets (CSW LBAP Partnership)
31.Potential Indicator - Area of highly sensitive historic landscape characterisation type(s) which have been altered and their character eroded
32.Potential Indicator - % of planning applications where archaeological mitigation strategies (preservation by design and / or archaeological recording) were developed and implemented
33.Potential Indicator - % of planning applications for which archaeological investigations were required prior to approval
<b>7. To create and maintain safe, well-designed, high quality built environments</b>
34.Satisfaction with your neighbourhood as a place to live
35.Potential Indicator - Development complying with Secured By Design guidelines
<b>8. To protect and enhance the historic environment</b>
36.Number of listed buildings (by grade) on English Heritage's buildings/sites 'at risk' register
37.Number of scheduled ancient monuments on English Heritage's 'at risk' register
38.Number of registered Parks and Gardens on English Heritage's 'at risk' register
39.Investment in listed buildings – value added by grant schemes
40.Proportion of Conservation Areas protected by article 4 designation
41.Number of Conservation Areas covered by an up to date Conservation Area Statement (reviewed within the last 5 years)
<b>9. To create good quality air, water and soils</b>
42.Extent of Air Quality Management Areas
43.Air quality concentration levels
44.Water Framework Directive measures of water quality in local rivers
45.Potential Indicator - Major development (over 1000 sqm or 10 dwellings) located in areas of Grades 1, 2 and 3a agricultural
<b>10. To minimise the causes of climate change by reducing greenhouse gases and increasing the proportion of energy generated from renewable and low carbon sources.</b>
(43). Air quality concentration levels
46.Renewable energy installed by type
47.Per capita carbon emissions
48.Potential Indicator - Proportion of electricity produced via renewable resources
(26) Potential Indicator – Proportion of new homes built to code levels 4, 5 and 6
49.Potential Indicator - Commercial development built to BREEAM good and excellent
<b>11. To adapt to the predicted impacts of climate change including flood risk</b>
50.Estimated number of addresses located in level 2 or 3 flood zones
51.Planning applications decided in areas of flood risk (zones 2 and 3) by development type
52.Potential Indicator - Number of planning applications incorporating SUDs
53.Potential Indicator - Surface water run off indicator
<b>12. To meet the housing needs of the whole community (ensuring the provision of decent and affordable housing for all, of the right quantity, type, size and tenure)</b>
54.Net additional dwellings for the current year
55.Five year supply of housing
56.Affordable housing completions
57.Number of households on local authority housing waiting list
58.Homeless households in priority need in temporary accommodation
59.No. of private dwellings empty for more than 6 months per 1000 dwellings
60.Housing affordability - ratio of lower quartile house price to lower quartile earnings
<b>13. To protect, enhance and improve accessibility to local services and community facilities</b>

61.Number of eligible open spaces managed to Green Flag award standard
62. Percentage of District Council owned public buildings with access and facilities to people with disabilities
(17) Percentage of households within set distances of key services
<b>14. To improve health and well being</b>
63.Male/Female Years of Life lost per 10,000 population
Male/female life expectancy at birth
64.Percentage of residents taking 30 minutes or more moderate exercise five times per week
65.Highest and lowest ranked SOAs for health deprivation and disability
66.Number of households within 300m, 2km & 5km of 2ha, 20ha and 100ha accessible natural greenspace (ANGst) respectively
67.Potential Indicator - Amount of unrestricted greenspace per 1000 population
<b>15. To reduce poverty and social exclusion</b>
68.Proportion of working age population claiming workless benefits
69.Index of multiple deprivation (rank of super output areas)
<b>16. To reduce crime, fear of crime and antisocial behaviour</b>
70.Fear of crime by type <ul style="list-style-type: none"> <li>• home broken into and having something stolen</li> <li>• being physically attacked by strangers</li> <li>• having their car stolen</li> </ul>
71.Recorded crime rates by type <ul style="list-style-type: none"> <li>• Violent crime</li> <li>• Vehicle crime</li> <li>• Domestic burglary</li> <li>• Criminal damage</li> </ul>
72.Recorded Antisocial Behaviour Rates
73.Percentage of respondents that have a 'high' perceived level of antisocial behaviour in their local area

## 7.0 Summary of Findings and Next Steps

### Findings

- 7.1 The Sustainability Appraisal process has considered the strategic environmental and wider sustainability effects that are likely, or that have the potential to occur, as a result of the implementation the Publication Draft Local Plan. Where possible, the process has identified opportunities to enhance the positive effects of the plan and mitigate the negative effects. This is in addition to the mitigation and enhancement measures already contained within the Plan. The appraisal recognises the need to consider the wider policy and operational context of the implementation of plan policies, and hence wider recommendations that may be applied to further Development Plan Documents (for example the Canal-side DPD and Royal Leamington SPA AAP) are also included.
- 7.2 Throughout the development of the Local Plan, alternatives have been considered and appraised through the SA process in an iterative and ongoing way such that the findings of the SA have informed plan-making. The SA of the Local Plan has appraised the effects of policies and site allocations, as well as the overall effect of the plan, including cumulative and incremental effects. The SA has found that the Publication Draft Local Plan will make a significant contribution to sustainability in the District, with a particularly strong focus on meeting housing, employment and community needs, enhancing accessibility and encouraging high quality design.
- 7.3 The Local Plan focuses development in existing urban areas and to the south of Warwick and Leamington on non-Green Belt Land. This has the potential for major long-term negative effects on sensitive receptors including heritage, landscape and biodiversity in these areas. The Local Plan contains strong policies that seek to protect, enhance and restore the natural environment and heritage as well as ensure that development proposals demonstrate that they will not have adverse effects. The SA considered that the mitigation provided by Local Plan policies will ensure that negative effects are not significant but that the overall cumulative effect of the Local Plan on the natural environment and heritage remains uncertain.
- 7.4 The overall level of growth also has the potential for negative effects on sensitive receptors such as air quality through increased levels of traffic. However, updated transport and air quality assessment evidence has shown that the cumulative effect of development in the south of the District can be addressed through careful planning and design as well as appropriate contributions towards the improvement of infrastructure. The air quality of the District is predicted to significantly improve over the life of the Plan.

### Next Steps

- 7.5 The consultation responses received will be considered and any significant changes made to the Submission Local Plan will be subject to further appraisal; an updated SA Report will be published alongside the Local Plan Submission Document.

- 7.6 This SA Report is available for comments alongside the Publication Draft Local Plan for a six week period commencing 12<sup>th</sup> May to 23<sup>rd</sup> June 2014. All responses should be sent to:

**Address:** Development Policy Manager  
Development Services  
Warwick District Council  
Riverside House  
Milverton Hill  
Leamington Spa  
CV32 5QH

**Email:** [newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk)

- 7.7 Responses may also be made using the Warwick District Council Website by using the following link:  
[www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)